

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

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**FIFTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES  
FOR PULMAN, CAPPuccio & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE  
FOR THE TIME PERIOD OF JUNE 1, 2023 TO SEPTEMBER 30, 2023**

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**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO  
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS  
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN  
MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE  
HELD.**

Name of Applicant:		Randall A. Pulman Pulman Cappuccio & Pullen, LLP
Applicant's professional role in case		Counsel for the Chapter 7 Trustee
Indicate whether this is an interim or final application		Interim
Date Order of Appointment filed		01/20/2022 [ECF No. 48]
Effective Date of Appointment		12/20/2021
	Beginning of Period	Ending of Period
Total period covered in application	06/01/2023	09/30/2023
Time periods covered by any prior applications	12/15/2021	05/31/2023

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1 The Jointly Administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a "**Bankruptcy Estate**" and collectively, "**Bankruptcy Estates**".

Total amounts awarded in all prior applications	\$1,101,162.39
Amount of retainer received in the case	\$0.00
Total amount of credits applied by PC&P to fees in all prior applications	\$38,320.00
Total fees applied for in the Fifth Fee Application and in all prior applications (including any retainer amounts or credits applied or to be applied)	\$1,275,112.50
Total fees applied for in the Fifth Fee Application (including any retainer amounts or credits to be applied)	\$193,362.50
Total professional hours covered by the Fifth Fee Application	787.60
Reimbursable expenses sought in the Fifth Fee Application	\$8,713.62
Application Cost	Approximately \$10,000.00
Total fees and reimbursable expenses sought in the Fifth Fee Application	\$202,076.50

TO THE HONORABLE MICHAEL M. PARKER, UNITED STATES BANKRUPTCY JUDGE:

Pulman, Cappuccio & Pullen, LLP (“**PC&P**”), attorneys for John Patrick Lowe, Chapter 7 Trustee (“**Trustee**”) for the bankruptcy estates of deeproot Capital Management, LLC, Policy Services, Inc., Wizard Mode Media, LLC, deeproot Pinball LLC, deeproot Growth Runs Deep Fund, LLC, deeproot 575 Fund, LLC, deeproot 3 Year Bonus Income Debenture Fund, LLC, deeproot Bonus Growth 5 Year Debenture Fund, LLC, deeproot Tech LLC, deeproot Funds LLC, deeproot Studios LLC (each a “**Debtor**” and collectively, the “**Debtors**”), being jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523, hereby files this *Fifth Interim Application for Allowance of Hourly Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of June 1, 2023 to September 30, 2023* (“**Fifth Fee Application**”), for allowance of compensation of \$193,362.50 in fees and reimbursement of expenses of \$8,713.62, for a total of \$202,076.12, for the time period of June 1, 2023 to September 30, 2023. In support of the Fifth Fee Application, PC&P respectfully asks the Court to approve and authorize this Fifth Fee Application, based on the following:

## **I. JURISDICTION AND VENUE**

1. This Court has jurisdiction over this Fourth Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue for this case is proper in the Western District of Texas under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

2. On December 9, 2021, (the “**Petition Date**”), the Debtors filed voluntary petitions under Chapter 7 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “**Bankruptcy Code**”) [ECF No. 1]. The Court, by its Order entered December 21, 2021, authorized that the Debtors’ bankruptcy cases be jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523 (the “**Jointly Administered Case**”) [ECF No. 20].

3. On or about December 21, 2021, John Patrick Lowe was duly appointed as Trustee.

4. The statutory predicates for the relief sought by this Fifth Fee Application are sections 328(a) and 331 of the Bankruptcy Code.

5. A copy of the proposed order in conformity with Local Rule 9013 is attached as Exhibit A.

6. A copy of the Notice and Summary of the Fifth Fee Application is attached as Exhibit B.

## **II. FACTUAL AND PROCEDURAL BACKGROUND**

7. The Debtors in this Jointly Administered Case are entities through which the Debtors’ principal, Mr. Robert Mueller (“**Mueller**”) ran a Ponzi scheme. Mueller controlled, as the sole owner, officer and director of each of the Debtors, all of their operations. Upon information and belief, Mueller raised, on behalf of the Debtors, in excess of \$70,000,000 from individual investors over the past decade.

8. Initially, Mueller raised monies from individual investors through Debtor, Policy Services, Inc. (“**PSI**”), by purportedly selling fractional interests in the death benefits payable on life insurance policies (the “**Policies**”) purchased by PSI. These fractional interests in the Policies are known as life settlements. *See Life Partners, Inc. v. Arnold*, 464 S.W.3d 660, 662 (Tex. 2015).

9. In or around 2015, Mueller stopped raising investor money directly through PSI and began to raise investor money primarily, though not exclusively, through two of the other Debtors, deeproot Growth Runs Deep Fund, LLC, and deeproot 575 Fund, LLC (the “**Funds**”). After Mueller switched to raising monies through the Funds, the investment pitch varied over time, but essentially investors were promised a guaranteed annual return of 5% to 7% payable at the end of the applicable investment period. Investors purchased debentures—or long-term unsecured obligations—to pay. Mueller marketed the Funds as having investments in life settlements, agriculture, real estate, and sports and entertainment businesses. In 2017, invested monies, by way of intercompany transfers to deeproot Pinball, LLC, deeproot Studios, LLC, deeproot Tech, LLC, and Wizard Mode Media, LLC, were used to support Mueller’s ultimately unsuccessful effort to develop and manufacture state of the art pinball machines. The Debtors’ pre-petition financial statements and each of the Debtors’ respective schedules reflect that none of the Debtors generated any net income and, in most cases, had no revenue at any time. Despite the lack of revenue and net income, the Debtors did return investments to some of the investors.

10. On or about August 20, 2021, the United States Securities and Exchange Commission (the “**SEC**”) filed suit<sup>2</sup> against Debtors Policy Services, Inc. and deeproot Funds, LLC, and Mueller individually, for violations of federal securities law, and named Mueller’s immediate family members, Jeffery L. Mueller and Belinda B. Breen, as relief parties (the “**SEC**

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<sup>2</sup> *Securities and Exchange Commission v. Robert J. Mueller, et al.*, Civil Action No. 5:21-cv-785, U.S. Dist. Ct. for the W. Dist. Of Texas, San Antonio Division.

**Civil Action**”). An injunction was entered prohibiting the solicitation of additional funds. Shortly thereafter, on December 9, 2021, chapter 7 bankruptcy petitions were filed for each of the Debtors.

11. On January 20, 2022, the Court entered its *Order on the Application of Trustee to Employ Counsel* (the “**Employment Order**”), wherein the Court authorized the Trustee to employ PC&P as counsel [ECF No. 48]. The Employment Order permits PC&P to seek interim compensation as provided in 11 U.S.C. §331, subject to approval by this Court. A copy of the Employment Order is attached hereto as Exhibit C.

12. On May 13, 2022, PC&P filed its *First Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of December 15, 2021 to April 30, 2022*, with the Court (“**First Fee Application**”). [ECF No. 111].

13. On June 9, 2022, the Court entered its *Order Granting First Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of December 15, 2021 to April 30, 2022*, authorizing the Trustee to pay to PC&P as an administrative expense, hourly fees in the amount of \$226,982.50 and expenses in the amount of \$28,952.54 from the Bankruptcy Estate accounts of the Debtors as designated in the Court’s Order. [ECF No. 125].

14. On October 31, 2022, PC&P filed its *Second Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of May 1, 2022 to September 30, 2022*, with the Court (“**Second Fee Application**”). [ECF No. 189].

15. On December 6, 2022, the Court entered its *Order Granting Second Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as*

*Counsel to the Trustee for the Time Period of May 1, 2022 to September 30, 2022*, authorizing the Trustee to pay to PC&P as an administrative expense, hourly fees in the amount of \$259,247.00 and expenses in the amount of \$6,145.75 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. [ECF No. 211].

16. On March 3, 2023, PC&P filed its *Third Interim Application for Allowance of Legal Fees and Expenses for Pullman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2022 to January 31, 2023*, with the Court ("**Third Fee Application**"). [ECF No. 260].

17. On April 6, 2023, the Court entered its *Order Granting in Part Third Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2022 to January 31, 2023*, authorizing the Trustee to pay to PC&P as an administrative expense, interim hourly fees in the amount of \$309,885.00 and expenses in the amount of \$29,860.29 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. The Court ordered that the amount of the fees for redacted time entries found in the detailed time descriptions attached to the Third Fee Application ("**Redacted Time Entries**") should be disallowed as the Court was then unable to assess the reasonableness and necessity of the services performed. The amount of the partial award of interim fees thus reflected PC&P's requested interim fees of \$324,644.00 less \$14,759.00, the amount of the Redacted Time Entries. The Court further ordered that its Order was without prejudice to PC&P in a subsequent application seeking recovery of the Redacted Time Entries. [ECF No. 272].

18. On July 3, 2023, PC&P filed its *Fourth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time*

*Periods of February 1, 2023 to May 31, 2023*, with the Court (“**Fourth Fee Application**”). [ECP No. 282].

19. On August 1, 2023, the Court entered its *Order Granting in Part Fourth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Periods of February 1, 2023 to May 31, 2023*, authorizing the Trustee to pay to PC&P as an administrative expense, interim hourly fees in the amount of \$231,544.50 and expenses in the amount of \$8,544.81 from the Bankruptcy Estate accounts of the Debtors as designated in the Court’s Order. The Court ordered that the amount of the fees for certain time entries found in the detailed time descriptions attached to the Third Fee Application (“**Clerical Time Entries**”), should be disallowed. The amount of the partial award of interim fees thus reflected PC&P’s requested interim fees of \$232,556.50 less \$1,012.00, the amount of the Clerical Time Entries.

### **III. APPLICATION FOR HOURLY SERVICES**

20. PC&P has provided legal services and expended 787.60 hours from June 1, 2023 to September 30, 2023 (the “**Application Period**”), totaling \$193,362.50 in fees representing the Trustee. The average hourly rate for this fee application was \$245.51 per hour.

21. During this four month Application Period, lawyers from PC&P on behalf of the Trustee:

- a) Negotiated settlements with Finders recovering \$329,494.29 on behalf of the Estates as of September 30, 2023;
- b) Obtained default judgments in eleven Finders Matters in the total amount of \$1,697,963.22;
- c) Prepared and responded to pleadings and discovery requests in the numerous avoidance actions;
- d) Attended hearings and obtained default judgments against Finders; and

e) Communicated and negotiated with attorneys for the United States Department of Justice and the Securities and Exchange Commission.

22. Below is a chart summarizing fees, expenses and hours expended in the Bankruptcy

Case by PC&P by matter number.

<b>PC&amp;P Matter No.</b>	<b>Matter Description</b>	<b>Debtor Estate</b>	<b>Fees</b>	<b>Expenses</b>	<b>Hours</b>
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$35,147.50	\$5,088.99	141.80
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$12,040.00	\$2,167.85	28.10
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$550.00	\$0.00	2.00
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$100.00	\$0.00	0.20
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$14,637.50	\$759.86	46.70
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$4,900.00	\$0.00	22.90
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$4,657.50	\$0.00	20.90
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$4,582.50	\$0.00	30.90
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$0.00	8.40



1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$220.00	\$0.00	0.80
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$3,415.00	\$0.00	21.20
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$110.00	\$0.00	0.40
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$8,595.00	\$76.92	28.50
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$0.00	8.40
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$17,887.50	\$0.00	59.60
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$440.00	\$0.00	1.60
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$302.50	\$0.00	1.10
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$945.00	\$0.00	3.40
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$9,070.00	\$0.00	41.30
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$8,755.00	\$0.00	36.90
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$110.00	\$0.00	0.40
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$1,977.50	\$0.00	8.70
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$800.00	\$5.00	3.00
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$4,380.00	\$0.00	30.10
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$82.50	\$5.00	0.30
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00

1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$5,585.00	\$0.00	18.90
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$1,172.50	\$0.00	4.10
1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$1,477.50	\$0.00	7.70
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$1,482.50	\$25.00	5.70
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$137.50	\$585.00	0.50
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$835.00	\$0.00	3.10
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$6,290.00	\$0.00	33.20
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$4,115.00	\$0.00	27.10
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$735.00	\$0.00	2.80
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$4,435.00	\$0.00	22.90
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,235.00	\$0.00	11.20
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$1,535.00	\$0.00	8.60
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$3,815.00	\$0.00	28.00
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	Amercian Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$965.00	\$0.00	3.10

1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$3,937.50	\$0.00	9.80
1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$13,557.50	\$0.00	34.70
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$3,917.50	\$0.00	18.60
	<b>Total:</b>		<b>\$193,362.50</b>	<b>\$8,713.62</b>	<b>787.60</b>

Attached hereto as Exhibit D-1 through D-62 are copies of billing invoices itemizing the fees incurred by PC&P in each of the sixty-two matters, by date and billing category.

**A. Summary of Services Rendered in the Bankruptcy Case by Category**  
PC&P Matter Nos. 1934.001 – 1934.062

<b>Category</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
B110	Case Administration	7.5	\$957.50
B120	Asset Analysis and Recovery	7.7	\$2,705.00
B160	Fee/Employment Applications	58.4	\$22,100.00
B190	Other Contested Matters (excluding assumption/rejection motions)	694.7	\$164,705.00
B310	Claims Administration and Objections	19.3	\$2,895.00
	<b>Total:</b>	<b>787.6</b>	<b>\$193,362.50</b>

**i. Case Administration (B110)**

23. Services rendered in this category involved the management of all case related data, documents and files in the possession of PC&P. This includes the management and organization by PC&P paralegal staff of all data received by PC&P in digital form, discovered on Debtors' servers and data received from third parties, as well as the scanning and digitization of all paper documents and files discovered at Debtors' offices and received from third parties, for the purpose of allowing lawyers from PC&P to conduct efficient review and searches of all data, documents and files related to the Bankruptcy Case.

24. PC&P expended a total of 7.50 hours in the main bankruptcy case, which resulted in total charges of \$957.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibit D-1.

**ii. Asset Analysis and Recovery (B120)**

25. Services rendered in this category include the investigation of the assets of certain Finders in connection with the collection default judgments obtained by lawyers from PC&P in certain adversary proceedings brought against such Finders.

26. PC&P expended a total of 7.70 hours, which resulted in total charges of \$2,705.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-62.

**iii. Fee/Employment Applications (B160)**

27. Services rendered in this category involved drafting the Fourth Fee Application and this Fifth Fee Application.

28. PC&P expended a total of 58.40 hours in the main bankruptcy case, which resulted in total charges of \$22,100.00 for services rendered in this project category, which amounts to approximately \$378.00 per matter in the Bankruptcy Case. The detailed time descriptions for this category are included in Exhibit D-1.

**iv. Other Contested Matters (excluding assumption/rejection motions) (B190)**

29. Services rendered in this category include the administration of adversary actions brought by lawyers with PC&P on behalf of the Trustee, preparing and responding to discovery requests, preparing motions for default, attending hearings, communicating with opposing counsel, and engaging in settlement negotiations.

30. PC&P expended a total of 694.70 hours, which resulted in total charges of

\$164,705.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-62.

**B. Summary of Services Rendered in the Main Bankruptcy Case**

**i. Matters Relating to Case Administration**

PC&P Matter No. 1934.001 (Estate: Policy Services, Inc., Case No. 21-51513)

31. Services rendered in this category by lawyers from PC&P involved the review and analysis of debtor data, documents and records in the possession of PC&P. The management and organization of all data received by PC&P, including documents and data received from third parties in connection with the Net Winner Matters and Finder Matters.

32. Services rendered in this category also include meetings and discussions amongst PC&P attorneys concerning case strategy, work flow, assignment of tasks, and legal research and analysis.

33. PC&P expended a total of 7.5 hours on case administration in the main bankruptcy case, which resulted in charges of \$957.50 for services rendered in this matter. The detailed time descriptions for this matter are included in Exhibit D-1.

**ii. Matters Relating to Fee/Employment Applications**

PC&P Matter No. 1934.001 (Estate: Policy Services, Inc., Case No. 21-51513)

34. Services rendered in this category involved drafting the Fourth Fee Application and this Fifth Fee Application.

35. PC&P expended a total of 81.80 hours on fee/employment applications in the main bankruptcy case, which resulted in total charges of \$31,075.00 for services rendered in this matter. The detailed time descriptions for this matter are included in Exhibits D-1, D-2, D-7, D-8, D-11.

**C. Matters Relating to the SEC**

PC&P Matter No. 1934.002 (Estate: deeproot Funds, LLC, Case No. 21-51521)

36. Services rendered by lawyers from PC&P relating to the SEC and the SEC Case

(the “**SEC Matter**”) include responding to discovery requests, video and telephone conferences with SEC attorneys, telephone conferences with third parties, review and analysis of proofs of claim filed by the SEC, telephone conferences with Robert Mueller’s counsel regarding mediation, attending mediation.

37. In connection with the SEC Matter, PC&P expended a total of 28.10 hours, which resulted in total charges of \$12,040.00. The detailed time descriptions for this matter are included in Exhibit D-2.

**D. Matters Relating to Adversary Proceedings - Net Winners**

PC&P Matter Nos. 1934.006, 1934.018 (Estate: Policy Services, Inc., Case No. 21-51513)

38. These matters (the “**Net Winner Matters**”) concern adversary proceedings brought by the Trustee against those investors who are what the law describes as net winners (i.e. investors who were returned the principal amount of their investment and who also received a return on that investment in the form of interest payments, dividends, etc.). The Debtors’ records reflect that there were 6 net winners, with a total of \$566,163.47 of transfers potentially recoverable to the Estates under 11 U.S.C. §§ 548 and 544 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act).

39. As of May 31, 2023, lawyers from PC&P negotiated settlements in five of the Net Winner Matters and were granted a default judgment in the sixth, recovering a total of \$422,564.47, or approximately 75% of the total amount of transfers potentially recoverable to the Estates.

40. Services rendered by lawyers from PC&P relating to the Net Winner Matters, include the negotiation and drafting of stipulations for case closure and dismissal and motion to dismiss.

41. In connection with the Net Winner Matters, PC&P expended a total of 2.8 hours, which resulted in total charges of \$770.00. The detailed time descriptions for these matters are included in Exhibits D-6 and D-18.

**E. Matters Relating to Adversary Proceeding – Finders**

PC&P Matter No. 1934.011, 1934.012, 1934.015, 1934.016, 1934.017, 1934.021-1934.056 (Estate: Policy Services, Inc.)

42. These matters (the “**Finders Matters**”) concern thirty-three (33) adversary proceedings brought by the Trustee against those individuals and companies who are referred to in Debtors’ records as finders (the “**Finders**”) to recover commissions paid by Debtor, Policy Services, Inc., totalling approximately \$6,133,804.49. The Finders are individuals and companies (primarily investment advisers or insurance agents/agencies) who contracted with Debtors to find individual investors willing to invest in one or more of the deeproot investment funds. The Finders received commissions from the Debtors based on the amount of funds invested by the individual investors in the deeproot Funds. These commissions constitute avoidable transfers recoverable by the Trustee under 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act).

43. As of September 30, 2023, lawyers from PC&P successfully negotiated settlements with individual defendants in six Finders Matters (PC&P Matter Nos. 1934.023, 1934.029, 1934.039, 1934.046, 1934.051, 1934.054, 1934.038, and 1934.015), recovering a total of \$329,494.29, and obtained default judgments in eleven Finders Matters (PC&P Matter Nos. 1934.032, 1934.028, 1934.022, 1934.017, 1934.025, 1934.027, 1934.033, 1934.039, 1934.042, 1934.043, and 1934.055) in the total amount of \$1,697,963.32. A motion for default is currently pending in one Finders Matter (PC&P Matter No. 1934.034) for claims in the total amount of \$60,754.50.

44. Services rendered by lawyers from PC&P relating to the Finders Matters, include the negotiation and drafting of settlement agreements, drafting requests for the clerk's entry of default, drafting motions for entry of default judgment, appearing for and attending default hearings, preparation of post judgement discovery requests, and drafting Rule 9019 motions.

45. In connection with the Finders Matters, PC&P expended a total of 548.50 hours, which resulted in total charges of \$122,927.50. The detailed descriptions of these matters are included in Exhibits D-11, D-12, D-15 – D-17, D-21 – D-56.

**F. Matters Relating to American Express Company**  
PC&P Matter No. 1934.059 (Estate: Policy Services, Inc.)

46. This matter concerns an adversary proceeding brought by the Trustee against the American Express Company, pursuant to 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act), seeking to avoid fraudulent transfers in the total amount of \$1,533,308.77.<sup>3</sup> (the “**American Express Matter**”).

47. As is detailed in the Mueller Complaint, Mueller used approximately \$2.1 million from the Debtors' bank accounts to pay many personal expenses (the “**Mueller Transfers**”). From December 10, 2014 to June 7, 2019, approximately \$1,533,308.77 of the Mueller Transfers were charged by Mueller to an American Express Business Gold Rewards Card (the “**AmEx Card**”), issued to Robert J. Mueller, National Wealth Solutions, LLC (an inactive Texas limited liability company, owned by Mueller, which was at no time affiliated in any way with Policy Services or any of the deeproot entities). According to the Debtors' records, Mueller paid American Express for the personal expenses he charged to the AmEx Card using Debtor, Policy

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<sup>3</sup> See, *John Patrick Lowe, Chapter 7 Trustee for the Bankruptcy Estate of deeproot Capital Mgmt. LLC, et al. v. American Express Co.*, Adv. Proc. No. 22-05098, filed December 8, 2022 [ECF No. 1].



Services' bank accounts. Such payments constitute a transfer of Debtor, Policy Services' interest in property for which Policy Services received nothing of value.

48. Lawyers from PC&P negotiated the successful settlement of the American Express Matter recovering a total of \$650,000.00 to the Estate.

49. In connection with the American Express Matter, PC&P expended a total of 3.10 hours, which resulted in total charges of \$965.00. The detailed description of this matter is included in Exhibit D-59.

**G. Matters Relating to TuYo v. Transamerica Life Insurance Company**

PC&P Matter No. 1934.060 (Estate: Policy Services, Inc.)

50. This matter (the “**Transamerica Matter**”) concerns a lawsuit brought by TuYo Holdings, LLC (“**TuYo**”), against Transamerica Life Insurance Company (“**Transamerica**”).<sup>4</sup> TuYo was the purchaser, pursuant to that certain Life Insurance Policy Purchase and Sale Agreement (the “**Purchase Agreement**”), of the in-force and lapsed life insurance policies owned by the Estate of Policy Services, Inc., as authorized by the Court pursuant to its *Order Authorizing and Approving the Sale of Certain Personal Property Free and Clear of All Interests Pursuant to 11 U.S.C. §§ 363(b) and (f)*. [ECF No. 103]. The Transamerica lawsuit concerns one of the lapsed life insurance policies purchased by TuYo pursuant to the Purchase Agreement, which policy was issued by Transamerica, insuring the life of a Mr. Barry Siegel for \$1,500,000.00 (the “**Siegel Policy**”).

51. As alleged in the complaint, Mr. Siegel passed away on December 24, 2022. On March 10, 2023, TuYo made a formal claim to Transamerica to acknowledge it as the owner of the Siegel Policy and to pay the life insurance proceeds of \$1.5 million to TuYo. On March 24,

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<sup>4</sup> See, *TuYo Holdings, LLC, v. Transamerica Life Insurance Company*, Civil Action No. 5:22-00845-DAE (W.D. Tex) (the “**Transamerica Lawsuit**”).

2023, Transamerica rejected the claim stating the Siegel Policy had lapsed. TuYou has alleged that Transamerica wrongly terminated the Siegel Policy, has refused to reinstate the Siegel Policy, and has refused to pay the \$1.5 million death benefit.

52. Pursuant to the Purchase Agreement, in addition to the purchase price, TuYo agreed to remit to Trustee fifty percent (50%) of the net insurance benefits resulting from the successful reinstatement of a lapsed policy. As the Purchase Agreement identified the Siegel Policy as a lapsed policy, should TuYo prevail in the Transamerica Lawsuit and be paid the \$1.5 million death benefit, or some portion thereof, Trustee is entitled to receive an amount equal to fifty percent (50%) of the amount of the insurance benefit received by TuYo, minus TuYo's reimbursable expenses, as such are defined in the Purchase Agreement.

53. In connection with the Transamerica Lawsuit, Transamerica served the Trustee with a *Subpoena to Produce Documents* (the "**Subpoena**"), requesting the Trustee produce documents related to the Siegel Policy.

54. Lawyers from PC&P reviewed and analyzed the subpoena, reviewed Debtors' files for documents responsive to Transamerica's requests for production, reviewed responsive documents for privilege, and drafted objections and responses to Transamerica's requests for production contained within the Subpoena.

55. In connection with the Transamerica Matter, PC&P expended a total of 9.80 hours, which resulted in total charges of \$3,937.5. The detailed description of this matter is included in Exhibit D-60.

**H. Matters Relating to Carlile, Patchen & Murphy, LLP**  
PC&P Matter No. 1934.061 (Estate of Policy Services, Inc.)

56. This matter (the "**CPM Matter**") concerns a potential adversary proceeding against Carlile, Patchen & Murphy, LLP ("**CPM**"), a lawfirm that represented Debtor in connection with

certain matters involving preparation and approval of private placement memoranda concerning the Funds.

57. Services rendered by lawyers from PC&P included conference calls and correspondence with SEC attorneys regarding the Trustee's potential claims and the SEC's depotions of attorneys from CPM, attendance at depositions of attorneys from CPM, and internal meetings regarding strategy and potential adversary claims that may be brought on behalf of Trustee.

58. In connection with the CPM Matter, PC&P expended a total of 34.70 hours, which resulted in total charges of \$13,557.50. The detailed description of this matter is included in Exhibit D-61.

**I. Matters Relating to JP Morgan Chase**

PC&P Matter No. 1934.062 (Estate: Policy Services, Inc.)

59. This matter concerns an adversary proceeding brought by the Trustee against the JP Morgan Chase Bank, N.A. ("**Chase Bank**"), pursuant to 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act), seeking to avoid fraudulent transfers in the total amount of \$177,758.40.<sup>5</sup> (the "**Chase Matter**").

60. As detailed in the complaint, from August 12, 2019 to January 12, 2021, \$177,758.40 of the Mueller Transfers were charged by Mueller to a Chase Bank Southwest Rapid Rewards Card, issued to Mueller (the "**Chase Bank Card**"). Mueller paid Chase Bank for the personal expenses charged to the Chase Bank Card using Debtor, Policy Services' bank accounts. Policy Services received nothing of value in return for the payments made to Chase Bank from Policy Services' bank accounts.

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<sup>5</sup> See, *John Patrick Lowe, Chapter 7 Trustee for the Bankruptcy Estate of deeproot Capital Mgmt. LLC, et al. v. JP Morgan Chase Bank, N.A.*, Adv. Proc. No. 23-05037, filed April 20, 2023 [ECF No. 1].

61. Lawyers from PC&P engaged in negotiations with counsel for Chase Bank regarding Chase Bank's motion to dismiss, prepared stipulations of extensions of time to respond to motion to dismiss, prepared Rule 26 disclosures, and prepared discovery requests.

62. In connection with the Chase Matter, PC&P expended a total of 18.6 hours, which resulted in total charges of \$3,917.50. The detailed description of this matter is included in Exhibit D-62.

**J. Reimbursement of Expenses**

63. PC&P also files this Fifth Fee Application seeking reimbursement of the reasonable out-of-pocket expenses incurred during the Application Period, in the amount of \$8,713.62. The total expenses incurred by matter are included on the chart found in paragraph 20, above. An itemization report of the expenses incurred by matter is provided in each of Exhibits D-1 through D-62. All expenses for which compensation is requested by PC&P were incurred for and on behalf of the Trustee, and not on behalf of any committee, creditor, or other person.

**K. Allocation of Fees by Matter.**

64. Trustees' counsel has allocated the time expenses by the matters discussed above. For the most part, legal fees and expenses associated with a particular estate are allocated to that estate. For example, fees and expenses associated with adversary proceedings brought against Finders are allocated to the estate of Policy Services, Inc., as the monies received by Finders were paid from Policy Services' bank accounts; fees and expenses associated with adversary proceedings brought against Net Winners are allocated to the estate of deeproot Funds, LLC, as the monies received by Net Winners were paid from deeproot Funds, LLC's bank accounts; and fees and expenses related to general case administration matters are allocated to Policy Services, Inc.

65. This is the Fifth Fee Application for fees and expenses filed by PC&P. This Fifth Fee Application requests approval of interim fees in the amount of \$193,362.50 and interim expenses in the amount of \$8,713.62, for a total allowed amount of \$202,076.50 in interim hourly fees and expenses.

#### **IV. Authorities and Argument**

66. The statutory predicates for the relief sought by this Third Fee Application are §§ 328(a) and 330 of the Bankruptcy Code.

67. Bankruptcy Code § 330(a) provides that in determining the amount of reasonable compensation to be awarded, a Court shall consider the nature, the extent, and the value of the services rendered by the professional, while taking into account the relevant factors, including the following:

- The time spent on such services;
- The rates charged for such services;
- Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered, toward the completion of the chapter 11 case;
- Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issues or task addressed;
- With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than chapter 11 cases.

11 U.S.C. § 330(a)(3). *See also Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833, 850 (3d Cir. 1994) (noting Bankruptcy Code's policy of providing adequate compensation and stating that "Congress rather clearly intended to provide sufficient economic incentive to lure competent bankruptcy specialists to practice in the bankruptcy courts.") (citation and internal quotation marks omitted).

*see also In re Woerner*, 783 F.3d 266, 274 (5th Cir. 2015) (“[Section 330] permits a court to compensate an attorney not only for activities that were ‘necessary,’ but also for good gambles—that is, services that were objectively reasonable at the time they were made—even when those gambles do not produce an ‘identifiable, tangible, and material benefit.’”) (citations and internal quotation marks omitted); *see also In re Pilgrim’s Pride Corp.*, 690 F.3d 650 (5th Cir. 2012) (reaffirming that bankruptcy courts have discretion to enhance professional fees in extraordinary cases).

68. The fees incurred by PC&P in representing the Trustee were reasonable and necessary for the administration of the Bankruptcy Case. As reflected in the attached Exhibits D-1 through D-62, PC&P has avoided unnecessary additional legal services and duplication of effort while striving to ensure the highest quality of legal representation.

69. The fees incurred by PC&P were for reasonable and necessary legal work that does not fall within the scope of the Trustee’s administrative duties. *See In re: Sharon Sylvester*, 23 F.4th 543, 548 (5th Cir. 2022).

70. PC&P performed these services within a reasonable period of time by professionals that have significant experience in bankruptcy cases. The rates charged by PC&P for this matter are comparable to the rates charged by PC&P in non-bankruptcy matters.

71. The PC&P professionals who have worked on this case during the Application Period are:

Name	Bar Admission Date	Rate	Hours expended on case	Fees requested in the Third Fee Application
Randall A. Pulman	Nov. 1, 1986	\$500.00	78.1	\$36,600.00
Leslie S. Hyman	Jun. 1, 1995	\$450.00	63.2	\$19,215.00
W. Drew Mallender	Oct. 1, 1992	\$375.00	65.0	\$21,487.50
Anna K. MacFarlane	Oct. 25, 2019	\$275.00	228.7	\$56,842.50
PARA-3		\$110.00	7.0	\$770.00
Gaurav Mankotia	Sept. 27, 2008 Bar Council of Delhi, India	\$100.00	292.1	\$28,410.00
Marshall Swanson	Nov. 6, 2015	\$275.00	4.8	\$1,320.00
Law Clerk(2)		\$150.00	41.7	\$6,255.00
Law Clerk(3)		\$150.00	7.0	\$1,050.00
		<b>Total:</b>	<b>787.60</b>	<b>\$193,362.50</b>

PC&P has met the requirements of § 330(a) of the Bankruptcy Code, and the Court should award the fees and expenses sought in this Fifth Fee Application.

72. The out-of-pocket expenses incurred by PC&P have been billed only for expenses actually incurred by PC&P. Accordingly, charges for expenses such as courier fees, filing fees, outside copy service, parking, travel, postage, meals, charges for public records and transcription services are billed at the actual cost to PC&P. PC&P is generally billed a flat monthly fee for legal research through Westlaw, and such charges are allocated based on actual usage to PC&P's clients.

73. PC&P submits that this Fifth Fee Application complies with §§ 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the United States Trustee Guidelines.

74. Detailed applications for compensation are required by the Bankruptcy Code, Local Rules, and applicable case law. This Fifth Fee Application has served the additional purpose of informing the Court and the creditors of the status of the case and the activities of the attorneys

involved. The time spent preparing the Fourth Fee Application is compensable. *See* 11 U.S.C. § 330(a)(6).

75. The Trustee has reviewed this Fifth Fee Application and has approved the requested amounts and the allocation thereof.

**WHEREFORE**, PC&P prays that upon consideration hereof, this Court enter an Order (i) approving PC&P's request for interim fees in the amount of \$193,362.50 in fees and \$8,713.62 in related expenses, for a total of \$202,076.12, (ii) authorizing the Trustee to immediately pay PC&P from the appropriate Estate Account the allowed amount of \$202,076.12 for the fees and expenses that have been incurred to date, and (iii) granting such other and further relief as the Court finds appropriate to grant.

Respectfully submitted,

**PULMAN, CAPPUCCIO & PULLEN, LLP**  
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**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE FOR THE JOINTLY  
ADMINISTERED BANKRUPTCY ESTATE OF  
DEEPROOT CAPITAL MANAGEMENT, LLC,  
ET AL.**



**CERTIFICATE OF SERVICE**

I hereby certify that on the 3<sup>rd</sup> day of November, 2023, I electronically filed the foregoing document using the CM/ECF system, which will serve the document on the following list of parties in interest and parties requesting notice. A copy of the notice/summary of this Fifth Interim Fee Application will be mailed via US First Class Mail to the parties on the limited service list in this case, and a supplemental certificate of service will be filed to evidence compliance.

**Via Counsel CM/ECF:**

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deeproot 575 Fund, LLC  
deeproot 3 Year Bonus Income Fund, LLC  
deeproot BonusGrowth 5 Year Debenture Fund, LLC  
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/s/ Randall A. Pulman

Randall A. Pulman

# **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

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**ORDER GRANTING  
FIFTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES  
FOR PULMAN, CAPPuccio & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE  
FOR THE TIME PERIOD OF JUNE 1, 2023 TO SEPTEMBER 30, 2023**

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Came on for consideration the *Fifth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of June 1, 2023 to September 30, 2023* (“**Fifth Interim Application**”). The Court has considered

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<sup>1</sup> The jointly administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

the Fifth Interim Application and finds that the fees and expenses represent reasonable compensation for actual and necessary services, and reimbursement for actual, necessary expenses. After considering the pleadings, the Court also finds that (i) it has jurisdiction over the matters raised in the Fifth Interim Application pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) proper and adequate notice of the Fifth Interim Application has been given and that no other or further notice is necessary; (iv) all objections to the Fifth Interim Application have been resolved by this Order or are overruled in their entirety; and (v) upon the record herein after due deliberation thereon good and sufficient cause exists for the granting of the relief as set forth herein.

**IT IS THEREFORE ORDERED** that the Fifth Interim Application pursuant to 11 U.S.C. § 330 is hereby **GRANTED**;

**IT IS FURTHER ORDERED** that the fees in connection with the legal services described in the Fifth Interim Application are allowed. All interim fees in the amount of \$193,362.50 and all expenses in the amount of \$8,713.62, for the allowance of a total of \$202,076.12 in hourly fees and costs, shall be an administrative expense of the respective Bankruptcy Estates<sup>2</sup> as outlined in the Fourth Interim Application.

**IT IS FURTHER ORDERED** the Trustee is authorized to immediately pay PC&P in connection with the hourly services provided, fees and expenses totaling \$202,076.12 from the specific Bankruptcy Estate accounts, as designated in the chart attached hereto as Exhibit 1.

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

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2 Capitalized terms shall have the meaning ascribed to them in the Fifth Interim Application.

**Submitted by:**

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**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE FOR THE JOINTLY ADMINISTERED  
BANKRUPTCY ESTATES OF DEEPROOT CAPITAL  
MANAGEMENT, LLC, *ET AL.***

## EXHIBIT 1

PC&P Matter No.	Matter Description	Debtor Estate	Fees	Expenses	Hours
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$35,147.50	\$5,088.99	141.80
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$12,040.00	\$2,167.85	28.10
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$550.00	\$0.00	2.00
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$100.00	\$0.00	0.20
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$14,637.50	\$759.86	46.70
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$4,900.00	\$0.00	22.90
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$4,657.50	\$0.00	20.90
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$4,582.50	\$0.00	30.90
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$0.00	8.40
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$220.00	\$0.00	0.80
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00

1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$3,415.00	\$0.00	21.20
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$110.00	\$0.00	0.40
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$8,595.00	\$76.92	28.50
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$0.00	8.40
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$17,887.50	\$0.00	59.60
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$440.00	\$0.00	1.60
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$302.50	\$0.00	1.10
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$945.00	\$0.00	3.40
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$9,070.00	\$0.00	41.30
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$8,755.00	\$0.00	36.90
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$110.00	\$0.00	0.40
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$1,977.50	\$0.00	8.70
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$800.00	\$5.00	3.00
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$4,380.00	\$0.00	30.10
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$82.50	\$5.00	0.30
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$5,585.00	\$0.00	18.90
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$1,172.50	\$0.00	4.10



1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$1,477.50	\$0.00	7.70
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$1,482.50	\$25.00	5.70
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$137.50	\$585.00	0.50
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$835.00	\$0.00	3.10
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$6,290.00	\$0.00	33.20
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$4,115.00	\$0.00	27.10
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$735.00	\$0.00	2.80
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$4,435.00	\$0.00	22.90
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,235.00	\$0.00	11.20
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$1,535.00	\$0.00	8.60
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$3,815.00	\$0.00	28.00
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	Americian Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$965.00	\$0.00	3.10
1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$3,937.50	\$0.00	9.80
1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$13,557.50	\$0.00	34.70

1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$3,917.50	\$0.00	18.60
	<b>Total:</b>		<b>\$193,362.50</b>	<b>\$8,713.62</b>	<b>787.60</b>

# **EXHIBIT B**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

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**NOTICE AND SUMMARY OF  
FIFTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES  
FOR PULMAN, CAPPUCCIO & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE  
FOR THE TIME PERIOD OF JUNE 1, 2023 TO SEPTEMBER 30, 2023**

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**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO  
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS  
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN  
MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE  
HELD.**

- I. CLIENT: John Patrick Lowe, Chapter 7 Trustee
- II. REQUESTING APPLICATION / FIRM: Randall A. Pulman of Pulman, Cappuccio & Pullen, LLP, (“**PC&P**”) as counsel to the Trustee
- III. TOTAL AMOUNT OF INTERIM FEES AND COSTS REQUESTED: \$202,076.12
  - a. Fees: \$193,362.50
  - b. Expenses and Cost Advances (PC&P): \$8,713.62
  - d. Time period covered: 06/01/2023 – 09/30/2023

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<sup>1</sup> The Jointly Administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

IV. BREAKOUT OF CURRENT APPLICATION

Name	Bar Admission Date	Rate	Hours expended on case	Fees requested in the Third Fee Application
Randall A. Pulman	Nov. 1, 1986	\$500.00	78.1	\$36,600.00
Leslie S. Hyman	Jun. 1, 1995	\$450.00	63.2	\$19,215.00
W. Drew Mallender	Oct. 1, 1992	\$375.00	65.0	\$21,487.50
Anna K. MacFarlane	Oct. 25, 2019	\$275.00	228.7	\$56,842.50
PARA-3		\$110.00	7.0	\$ 770.00
Gaurav Mankotia	Sept. 27, 2008 Bar Council of Delhi, India	\$100.00	292.1	\$28,410.00
Marshall Swanson	Nov. 6, 2015	\$275.00	4.8	\$ 1,320.00
Law Clerk(2)		\$150.00	41.7	\$ 6,255.00
Law Clerk(3)		\$150.00	7.0	\$ 1,050.00
		<b>Total:</b>	<b>787.60</b>	<b>\$193,362.50</b>

MINIMUM FEE INCREMENTS: 0.1 HOURS

EXPENSES: \$8,713.62 (Filing Fees, Photocopying and Postage associated with providing notices to creditors)

AMOUNT ALLOCATED FOR PREPARATION OF THIS FEE APPLICATION: \$10,000.00

V. PRIOR APPLICATIONS: First Interim Fee Application, Second Interim Fee Application, Third Interim Fee Application, and Fourth Interim Fee Application.

VI. OTHER CO-EQUAL OR ADMINISTRATIVE CLAIMANTS IN THIS CASE:

a. John Patrick Lowe, Chapter 7 Trustee (“Trustee”).

VII. RESULTS OBTAINED:

As reflected in the Fourth Interim Fee Application, PC&P has provided legal services and has obtained favorable results for the Bankruptcy Estates in connection with the services provided to the Bankruptcy Estates. Among other things, PC&P has: (1) negotiated favorable settlements of five of the Net Winners Matters and obtained a default judgement against the sixth Net Winner, recovering a total of \$422,564.47, or approximately 75% of the total amount of transfers potentially recoverable to the Estates; (2) communicated with SEC counsel, and attended the deposition of Carlile, Patchen & Murphy, LLP conducted by the SEC; (3) negotiated settlements with individual defendants in six of the adversary actions brought against Finders recovering a total of \$329,494.29, obtained default judgments in eleven adversary actions brought against Finders in the total amount of \$1,697,963.32; filed motions for default which are currently pending in one adversary action brought against Finders for claims in the total amount of \$60,754.50; (4) conducted discovery and negotiated stipulations in connection with the adversary action brought against JP Morgan Chase Bank for fraudulent transfers from

the Estate of Policy Services, Inc. for charges to Mueller's personal credit card in the approximate amount of \$177,758.40.

Below is a chart summarizing fees, expenses and hours expended in the Bankruptcy Case by PC&P by matter number.

<b>PC&amp;P Matter No.</b>	<b>Matter Description</b>	<b>Debtor Estate</b>	<b>Fees</b>	<b>Expenses</b>	<b>Hours</b>
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$35,147.50	\$5,088.99	141.80
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$12,040.00	\$2,167.85	28.10
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$550.00	\$0.00	2.00
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$100.00	\$0.00	0.20
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$14,637.50	\$759.86	46.70
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$4,900.00	\$0.00	22.90
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$4,657.50	\$0.00	20.90
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$4,582.50	\$0.00	30.90
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$0.00	8.40

1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$220.00	\$0.00	0.80
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$3,415.00	\$0.00	21.20
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$110.00	\$0.00	0.40
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$8,595.00	\$76.92	28.50
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$0.00	8.40
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$17,887.50	\$0.00	59.60
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$440.00	\$0.00	1.60
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1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$9,070.00	\$0.00	41.30
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$8,755.00	\$0.00	36.90
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$110.00	\$0.00	0.40
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$1,977.50	\$0.00	8.70
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1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$4,380.00	\$0.00	30.10
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1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$5,585.00	\$0.00	18.90
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1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$1,477.50	\$0.00	7.70
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$1,482.50	\$25.00	5.70
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$137.50	\$585.00	0.50
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$835.00	\$0.00	3.10
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$6,290.00	\$0.00	33.20
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$4,115.00	\$0.00	27.10
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$735.00	\$0.00	2.80
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$4,435.00	\$0.00	22.90
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,235.00	\$0.00	11.20
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$1,535.00	\$0.00	8.60
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$3,815.00	\$0.00	28.00
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	Amercian Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$965.00	\$0.00	3.10



1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$3,937.50	\$0.00	9.80
1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$13,557.50	\$0.00	34.70
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$3,917.50	\$0.00	18.60
	<b>Total:</b>		<b>\$193,362.50</b>	<b>\$8,713.62</b>	<b>787.60</b>

Respectfully submitted,

**PULMAN, CAPPUCCIO & PULLEN, LLP**  
2161 NW Military Highway, Suite 400  
San Antonio, Texas 78213  
[www.pulmanlaw.com](http://www.pulmanlaw.com)  
(210) 222-9494 Telephone  
(210) 892-1610 Facsimile

By: /s/Randall A. Pulman  
Randall A. Pulman  
Texas State Bar No. 16393250  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)

**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE**

# EXHIBIT C



**IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.**

**Dated: January 20, 2022.**

A handwritten signature in black ink, appearing to read "Mike Parker".

**MICHAEL M. PARKER  
UNITED STATES BANKRUPTCY JUDGE**

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL.,	§	BANKRUPTCY No. 21-51523-MMP
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

---

**ORDER ON THE APPLICATION OF TRUSTEE FOR AUTHORITY TO EMPLOY COUNSEL**

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Came on for consideration the *Application of Trustee for Authority to Employ Counsel* (the “**Application**”)<sup>1</sup> filed by John Patrick Lowe, the Chapter 7 Trustee (the “**Trustee**”) for the captioned jointly administered chapter 7 case. Based on the representations made in the Application and in the supporting *Affidavit of Randall A. Pulman in Support of the Application of Trustee for Authority to Employ Counsel*, the Court finds that (i) it has jurisdiction over the matters raised in the Application pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding

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<sup>1</sup> Capitalized terms unless otherwise defined herein shall have the meaning as ascribed to them in the Application.

pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in the Application approving the employment of Pulman, Cappuccio & Pullen, LLP (“**PC&P**”) is in the best interest of the Estate and its creditors; (iv) PC&P holds no interest adverse to the Estate and is a disinterested person under 11 U.S.C. § 101(14); (v) proper and adequate notice of the Application has been given and no further notice is necessary; (vi) no objections to the Application have been filed; and (vii) based upon the record herein, after due deliberation, good and sufficient cause exists for the granting of the Application in all respects.

**IT IS, THEREFORE, ORDERED** that pursuant to section 327(a) of the Bankruptcy Code, the Trustee is authorized to employ PC&P with Randall A. Pulman to act as lead counsel to represent him as Trustee in this Case effective as of December 20, 2021, in accordance with the terms described in the Application, the engagement letter, and this Order, and to perform the services described below:

- a) to file pleadings with the court and to represent the Estate's interest in regard to any adversaries, appeals, or contested matters before this court and litigation in other courts, particularly with regard to the Estate's interest in various assets and the positions of secured and unsecured creditors, whether by motion, adversary action, turnover proceedings, or litigation activities of every description in other courts;
- b) to investigate, analyze, institute and prosecute actions regarding determination and recovery of property of the Estate, including investigation and prosecution of determination and lien perfection, avoidance litigation as well as collection and liquidation of assets of the Estate, to the extent such activities would be economically beneficial to the Estate;
- c) to assist the Trustee where necessary to negotiate and consummate non-routine sales or leases of the assets of the Estate, wherever they may be found, including sales free and clear of liens, claims and encumbrances, and to institute any necessary proceedings in regard thereto;
- d) to institute and prosecute non-routine objections to exemptions and non-routine objections to proofs of claim;
- e) to co-ordinate activities with the United States Trustee as appropriate in connection with issues of the integrity of the bankruptcy courts and procedures;

- f) to aid in the representation of the Trustee in any litigation against Trustee in Trustee's official capacity;
- g) to assist in resolution of sales of, and any title problems associated with, the Estate's property; and
- h) to collect any judgments that may be entered in favor of the Estate; and
- i) to assist in any other work requested by the Trustee.

**IT IS FURTHER ORDERED** that the Law Firm shall not be compensated by the bankruptcy Estate for performing duties required to be performed by the Trustee.

**IT IS FURTHER ORDERED** that if any supplemental declarations or affidavits are filed and served after entry of this Order, absent any objections within 21 days after the filing and service of such supplemental declarations or affidavits, PC&P's employment shall continue as authorized pursuant to this Order.

**IT IS FURTHER ORDERED** that PC&P shall be compensated upon appropriate application in accordance with Bankruptcy Code sections 330 and 331, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy of the Western District of Texas.

**IT IS FURTHER ORDERED** that the Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

**SUBMITTED BY:**

Randall A. Pulman  
Texas State Bar No. 16393250  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)

Anna K. MacFarlane  
Texas State Bar No. 24116701  
[amacfarlane@pulmanlaw.com](mailto:amacfarlane@pulmanlaw.com)

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(210) 222-9494 Telephone  
(210) 892-1610 Facsimile

**PROPOSED ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE FOR THE JOINTLY ADMINISTERED CASE  
OF IN RE DEEPROOT CAPITAL MANAGEMENT, LLC ET AL.**

# **EXHIBIT D-1**

**PULMAN, CAPPUCIO & PULLEN, LLP**

Attorneys &amp; Counselors

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Office Locations:  
 San Antonio  
 Dallas/Fort Worth  
 McAllen

Lowe, Pat (dprt)  
 Pat Lowe, Trustee  
 2402 E. Main St.  
 Uvalde, TX 78801

September 30, 2023

Invoice No. 242976  
 Account No. 1934.001

Page: 1

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

Fees

				Rate	Hours	
06/02/2023	AKM B190	A101	Continue drafting omnibus 9019 Motion (AmEx, Gillen, Parchami, Senior Insurance, Obmann, Martins).	275.00	3.00	825.00
	WDM B160	A103	Draft/revise 4th interim fee application.	375.00	2.30	862.50
06/05/2023	AKM B190	A101	Email to G. Mankotia regarding preparing 9019 motion.	275.00	0.10	27.50
06/06/2023	AKM B190	A101	Confer with G. Mankotia regarding 9019 Motion.	275.00	0.20	55.00
	AKM B190	A101	Office conference with Randall A. Pulman and W. Drew Mallender regarding fee application.	275.00	0.20	55.00
	AKM B160	A101	Begin reviewing invoices for fee application.	275.00	1.50	412.50
	PR3 B110	A110	Manage data/files - Searching for and pulling documents and emails related to SIE687	110.00	3.00	330.00
	RAP B160	A104	Review of invoicing for reasonableness and assignment of time for 4th Fee Application; office conference with A. MacFarlane and D. Mallender regarding same.	500.00	2.50	1,250.00
	WDM B160	A103	Draft/revise 4th interim fee application.	375.00	2.00	750.00
	WDM B160	A105	Office conference with Randall A. Pulman and Anna MacFarlane regarding fee application.	375.00	0.30	112.50
06/07/2023	AKM B190	A101	Begin review and edit of draft 9019.	275.00	0.50	137.50



Lowe, Pat (dprt)

Statement No. 242976

Account No 1934.001

Deeproot - Policy Services, Inc. Case No. 21-51513

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					Rate	Hours	
	AKM	B160	A101	Review of invoices for fee app; confer with Randall A. Pulman regarding same.	275.00	2.50	687.50
06/08/2023	GM	B190	A101	Prepare combined 9019 along with a proposed order; confer with Anna MacFarlane regarding same; email Anna the same.	100.00	6.00	600.00
	AKM	B160	A101	Continue reviewing invoices for fee application; confer with W. Drew Mallender regarding same.	275.00	1.50	412.50
	WDM	B160	A104	Review/analyze billing statements for reasonableness and accuracy; draft/edit 4th interim fee application.	375.00	4.00	1,500.00
06/09/2023	PR3	B110	A110	Manage data/files - Organizing Files for SIE687 Subpoena	110.00	4.00	440.00
06/12/2023	WDM	B160	A104	Review/analyze attorney time entries for accuracy and reasonableness.	375.00	1.50	562.50
	GM	B190	A101	Continue prepare combined 9019; confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	5.00	500.00
06/13/2023	AKM	B190	A101	Continue drafting 9019 motion; email to G. Mankotia regarding same.	275.00	1.50	412.50
	WDM	B160	A105	Meet with staff regarding revisions to attorney time entries.	375.00	0.20	75.00
	GM	B190	A101	Continue prepare and edit combined 9019 after comments; confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	3.00	300.00
06/14/2023	AKM	B190	A101	Attention to 9019; confer with G. Mankotia regarding same and adding Wilken settlement.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare combined 9019 including Wilken Settlement Agreement. confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	5.00	500.00
	GM	B190	A101	Continue prepare and finalize combined 9019 after comments; confer with Randall A. Pulman regarding same.	100.00	1.00	100.00

Lowe, Pat (dprt)

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Deeproot - Policy Services, Inc. Case No. 21-51513

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				Rate	Hours	
06/15/2023	WDM B160	A103	Review and revise time/fee statements.	375.00	0.70	262.50
	GM B190	A101	Email Greg Hauswirth regarding deeproot adversaries.	100.00	0.20	20.00
06/16/2023	WDM B160	A103	Draft/revise Fourth Interim Fee Application. Final review of billing statements	375.00	2.60	975.00
06/19/2023	RAP B190	A108	Review and edit of 9019 Motion; office conference with G. Mankotia regarding same.	500.00	0.70	350.00
	WDM B160	A103	Draft/revise Fourth Interim Fee Application	375.00	0.70	262.50
	GM B190	A101	Continue prepare and finalize combined 9019 after Randall A. Pulman's edits; confer with Randall A. Pulman regarding same.	100.00	1.00	100.00
	GM B190	A101	Email Greg Hauswirth regarding discovery conferral; email Anna MacFarlane regarding same.	100.00	0.50	50.00
06/20/2023	AKM B190	A101	Email to Greg Murray regarding expert report.	275.00	0.10	27.50
	WDM B160	A103	Fourth Interim fee application, prepare fee and expense analysis spreadsheet.	375.00	5.20	1,950.00
06/21/2023	LC2 B190	A102	Researching and writing a memorandum regarding the interplay between certain corporate structures and bankruptcy doctrines	150.00	11.00	1,650.00
	AKM B190	A101	Attention to 9019 Motion finalization.	275.00	0.30	82.50
	AKM B190	A101	Phone call with Greg Murray regarding expert report timeline.	275.00	0.10	27.50
	RAP B190	A108	Final review and approval of 9019 Motion for filing.	500.00	0.20	100.00
	WDM B160	A103	Draft/revise 4th interim fee application, prepare spreadsheet analysis of fees and expenses by matter.	375.00	6.50	2,437.50
06/22/2023	RAP B160	A108	Review of invoices for reasonableness.	500.00	1.00	500.00
	WDM B160	A105	Office conference with Randall A.			

Lowe, Pat (dprt)

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Deeproot - Policy Services, Inc. Case No. 21-51513

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					Rate	Hours	
				Pulman regarding fee and expense analysis.	375.00	0.20	75.00
	WDM B160	A103		Draft/revise Fourth Interim Fee Application.	375.00	3.00	1,125.00
	WDM B160	A105		Office conference with staff regarding update to task code billing report.	375.00	0.20	75.00
	GM B190	A101		Email Greg Hauswirth regarding discovery conferral.	100.00	0.20	20.00
06/23/2023	RAP B160	A108		Review of 60 invoices for reasonableness.	500.00	2.00	1,000.00
	WDM B160	A103		Draft/revise Fourth Interim Fee Application.	375.00	7.00	2,625.00
06/26/2023	RAP B160	A104		Review of Fee Application before sent to client.	500.00	0.50	250.00
	WDM B160	A103		Draft/revise 4th Interim Fee Application, Proposed Order, Notice and Summary.	375.00	7.70	2,887.50
06/28/2023	WDM B160	A103		Edit 4th interim fee, Edit Notice and Summary.	375.00	0.30	112.50
06/29/2023	AKM B190	A101		Confer with Greg Murray regarding updates to expert report.	275.00	0.10	27.50
	WDM B160	A103		Review and final revisions to 4th interim fee application, proposed order, and notice and summary. Prepare exhibits.	375.00	2.50	937.50
	WDM B110	A105		Meeting with Chris Turner, Randall A. Pulman regarding contents of deeproot computers purchased by Mr. Turner.	375.00	0.50	187.50
06/30/2023	AKM B190	A101		Review of revised deeproot report from Greg Murray.	275.00	0.20	55.00
07/12/2023	LC2 B310	A102		Researching and compiling proofs of claim.	150.00	4.80	720.00
07/13/2023	LC2 B310	A102		Researching and compiling proof of claims.	150.00	7.50	1,125.00
07/14/2023	LC2 B310	A102		Researching and compiling proof of claims.	150.00	2.50	375.00

Lowe, Pat (dprt)

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Deeproot - Policy Services, Inc. Case No. 21-51513

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					Rate	Hours	
07/17/2023	LC2	B310	A103	Updating and researching proof of claims.	150.00	2.00	300.00
	LC2	B190	A102	Researching corporate structures.	150.00	1.80	270.00
07/18/2023	LC2	B310	A102	Finalizing proof of claims research and compilation.	150.00	2.50	375.00
	WDM	B190	A105	In office meeting with Anna Macfarlane regarding life insurance policies. In office meeting with Randall A. Pulman and Anna Macfarlane regarding debtor files containing life insurance policy lapse information.	375.00	0.60	225.00
07/19/2023	LC2	B190	A102	Finalizing proof of claims sheet.	150.00	1.50	225.00
	LC2	B190	A102	Researching and writing a memorandum regarding the application of certain statutes.	150.00	5.00	750.00
07/21/2023	LC2	B190	A103	Drafting and researching a memo regarding the affect of certain statutes on corporate relationships.	150.00	3.10	465.00
07/24/2023	AKM	B190	A101	Begin drafting 9019 Motion with Crombie, Financial Partners, and Fleming Financial.	275.00	0.50	137.50
07/31/2023	AKM	B190	A101	Review Murray report and confer with Randall A. Pulman regarding changes to same.	275.00	0.20	55.00
08/02/2023	AKM	B190	A101	Continue drafting 9019 Motion with Crombie, Financial Partners, and Fleming Financial and proposed order.	275.00	1.10	302.50
	AKM	B190	A101	Office conference with Randall A. Pulman regarding 9019 Motion and status of settlement with Financial Partners.	275.00	0.20	55.00
08/03/2023	AKM	B190	A101	Continue drafting 9019 Motion for settlement with Crombie, Fleming Financial, and Financial Partners; email to Randall A. Pulman regarding same.	275.00	1.00	275.00
08/04/2023	AKM	B190	A101	Continue drafting 9019 Motion and			

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				Rate	Hours	
			confer with Randall A. Pulman regarding same.	275.00	0.50	137.50
08/07/2023	AKM	B190	A101 Finalizing 9019 Motion for filing; oversee filing of same.	275.00	0.50	137.50
			For Legal Services Rendered		141.80	35,147.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	6.90	\$500.00	\$3,450.00
W. Drew Mallender	48.00	375.00	18,000.00
Anna K. MacFarlane	16.30	275.00	4,482.50
PARA-3	7.00	110.00	770.00
Gaurav Mankotia	21.90	100.00	2,190.00
Law Clerk (2)	41.70	150.00	6,255.00

Advances

06/23/2023	B110	E108	Postage - Mailout of ECF 280-9019 Motion - Blend Document Technologies #57467B	2,078.78
07/06/2023	B110	E108	Postage - Mailout 4th fee app - Blend Document Technologies #57504B	1,261.23
08/13/2023	B110	E108	Postage - Mailout of 9019 Motion - Blend Document Technologies #57631B	1,714.77
09/27/2023	B110	E124	Filing fee - eRecord Abstract of Judgment - CSC eRecording Solutions	34.21
			Total Advances	5,088.99
			Total Current Work	40,236.49
			Previous Balance	\$26,732.68
			<b>Balance Due</b>	<b><u>\$66,969.17</u></b>

Past Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
40,236.49	0.00	0.00	0.00	0.00	26,732.68

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Deeproot - Policy Services, Inc. Case No. 21-51513

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	957.50	5088.99
B160	Fee/Employment Applications	22100.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	9195.00	0.00
B100	Administration	32,252.50	5,088.99
B310	Claims Administration and Objections	2895.00	0.00
B300	Claims and Plan	2,895.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT D-2**

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September 30, 2023

Invoice No. 242977  
 Account No. 1934.002

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(deeproot funds) SEC v. Robert J. Mueller, Deeproot Funds, L

Fees

					Rate	Hours	
06/19/2023	RAP	B190	A108	Instructions to staff regarding documents for mediation; telephone conference with Huling regarding same; telephone conference with SEC attorney regarding same.	500.00	1.00	500.00
06/20/2023	RAP	B190	A108	Attend mediation.	500.00	6.00	3,000.00
06/21/2023	RAP	B190	A108	Telephone conference with J. Huling regarding status of negotiations.	500.00	0.80	400.00
06/22/2023	WDM	B190	A108	Telephone call with Chris Turner regarding SEC request for Life Settlement Certificates.	375.00	0.20	75.00
06/26/2023	WDM	B190	A108	Email correspondence with Chris Turner regarding SEC subpoena, request for documents.	375.00	0.20	75.00
	WDM	B190	A107	Telephone call with Kristen Warden, SEC counsel regarding request for copies of life settlement certificates.	375.00	0.20	75.00
	WDM	B190	A104	Identify and review documents responsive to SEC request.	375.00	0.60	225.00
06/27/2023	WDM	B190	A104	Review and produce life settlement certificates per SEC request. Email correspondence with Kristen Warden regarding production of SEC documents to Transamerica.	375.00	1.00	375.00



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(deeproot funds) SEC v. Robert J. Mueller, Deeproot

				Rate	Hours	
06/30/2023	WDM B190	A104	Review subpoena of Trustee received from Jay Hulings in connection with SEC case.	375.00	0.20	75.00
	WDM B190	A107	Email correspondence with Kristen Warden regarding 575 and dGRD Investors.	375.00	0.20	75.00
	RAP B190	A108	Review of subpoena from Mueller; telephone conference with P. Lowe regarding same; e-mail to Huling regarding response date.	500.00	1.00	500.00
	AKM B190	A101	Review of subpoena duces tecum; confer with Randall A. Pulman and Pat Lowe regarding same; attention to emails regarding same.	275.00	1.10	302.50
	AKM B190	A101	Email to Greg Murray regarding deeproot QB files for response to subpoena.	275.00	0.10	27.50
07/07/2023	WDM B190	A107	Review request from Kristen Warden regarding investors in 575 and dGRD Funds. Email Anna MacFarlane regarding request.	375.00	0.20	75.00
	AKM B190	A101	Research ND file for information on investors; email W. Drew Mallender regarding same.	275.00	1.00	275.00
07/10/2023	WDM B190	A104	Review/analyze deeproot investor spreadsheets regarding evidence of investor payments. Review spreadsheet of investor information prepared by Anna MacFarlane. Email to Kristen Warden regarding information contained in spreadsheets.	375.00	1.50	562.50
	AKM B190	A101	Emails with W. Drew Mallender regarding data requested by SEC; review of spreadsheet.	275.00	0.30	82.50
07/19/2023	AKM B190	A101	Teams call with team and SEC regarding investor database questions.	275.00	0.80	220.00
	RAP B190	A108	Telephone conference with SEC's counsel regarding accounting treatment of life insurance policies.	500.00	1.00	500.00

Lowe, Pat (dprt)

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(deeproot funds) SEC v. Robert J. Mueller, Deeproot

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					Rate	Hours	
	WDM B190	A105	Confer with Randall A. Pulman regarding SEC request for information concerning 575 and dGRD investors.		375.00	0.70	262.50
	WDM B190	A107	Conference call with SEC regarding questions concerning 575 and dGRD investors.		375.00	0.90	337.50
	LSH B120	A108	Video conference with SEC counsel and team.		450.00	0.40	180.00
07/24/2023	RAP B190	A104	Telephone conference with Huling regarding status of case and discovery.		500.00	0.50	250.00
	RAP B190	A104	Office conference with D. Mallender regarding response to Mueller's subpoena.		500.00	0.20	100.00
	WDM B190	A105	Office conference with Randall A. Pulman regarding response to Mueller subpoena.		375.00	0.20	75.00
07/25/2023	RAP B190	A104	Review and edit of response to request for production and subpoena.		500.00	1.00	500.00
	WDM B190	A103	Draft/revise objections and response to Mueller subpoena/request for production of documents.		375.00	2.80	1,050.00
07/26/2023	LSH B120	A103	Draft/revise objections to subpoena.		450.00	2.10	945.00
07/27/2023	LSH B120	A103	Finalize objections to subpoena.		450.00	0.40	180.00
09/06/2023	RAP B190	A104	Review of e-mail requesting database; e-mail to Turner requesting same; forward database to Mueller's counsel.		500.00	0.50	250.00
09/07/2023	RAP B190	A104	Review of e-mail from Small regarding database; respond to same.		500.00	0.30	150.00
09/13/2023	LSH B120	A108	Telephone conference with SEC counsel and R. Pulman.		450.00	0.20	90.00
	RAP B190	A104	Telephone conference with SEC counsel regarding evidence and status.		500.00	0.50	250.00
			For Legal Services Rendered			28.10	12,040.00

Lowe, Pat (dprt)

Statement No. 242977

Account No 1934.002

(deeproot funds) SEC v. Robert J. Mueller, Deeprroo

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Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	12.80	\$500.00	\$6,400.00
W. Drew Mallender	8.90	375.00	3,337.50
Anna K. MacFarlane	3.30	275.00	907.50
Leslie Hyman	3.10	450.00	1,395.00

Advances

07/31/2023	B110	E115	Transcripts - Gradillas Court Reporters #57038	1,561.75
09/05/2023	B110	E115	Deposition transcripts - Depo of: Andrew J. Federico - Gradillas Court Reporters #57116	606.10
			Total Advances	2,167.85
			Total Current Work	14,207.85

**Balance Due** \$14,207.85

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	0.00	2167.85
B120 Asset Analysis and Recovery	1395.00	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	10645.00	0.00
B100 Administration	12,040.00	2,167.85

Invoices are payable upon receipt.

# **EXHIBIT D-3**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-4**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-5**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-6**

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September 30, 2023

Invoice No. 242978  
 Account No. 1934.006

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(PSI) Claim against Jill R Winn - Net Winner

Fees

				Rate	Hours	
07/21/2023	AKM B190	A101	Drafting stipulation of dismissal of adversary proceeding.	275.00	0.60	165.00
08/04/2023	AKM B190	A101	Emails to Royal Lea (Winn), Jason Kathman (Medlangs), Martins, Gillen, Jarnecke regarding stipulation of dismissal.	275.00	0.50	137.50
	AKM B190	A101	Preparing letter to Alice Snell with stipulation of dismissal for signature.	275.00	0.20	55.00
08/05/2023	AKM B190	A101	Email from Candice Gillen regarding stipulation.	275.00	0.10	27.50
08/11/2023	AKM B190	A101	Draft and file voluntary Motion to Dismiss.	275.00	0.60	165.00
			For Legal Services Rendered		2.00	550.00

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	2.00	\$275.00	\$550.00

Total Current Work 550.00

**Balance Due** \$550.00



Lowe, Pat (dprt)

Statement No. 242978

Account No 1934.006

(PSI) Claim against Jill R Winn - Net Winner

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	550.00	0.00
B100	Administration	550.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT D-7**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-8**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-9**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-10**

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September 30, 2023

Invoice No. 242979  
 Account No. 1934.010

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(deeproot Tech) Sale of Pinball Property

Fees

					Rate	Hours	
06/16/2023	RAP	B120	A108	Telephone conference with P. Autry regarding Intertek destruction of pinball machine post petition.	500.00	0.20	100.00
				For Legal Services Rendered		0.20	100.00

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00

Total Current Work	100.00
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<b>Balance Due</b>	<b><u>\$100.00</u></b>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	100.00	0.00
B100	Administration	100.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT D-33**

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September 30, 2023

Invoice No. 242980  
 Account No. 1934.011

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(PSI) Potential Adversary Proceedings - Finders

Fees

				Rate	Hours	
06/05/2023	AKM B190	A101	Confer with G. Mankotia regarding case status.	275.00	0.30	82.50
	AKM B190	A101	Confer with Randall A. Pulman regarding default judgment hearings.	275.00	0.10	27.50
	GM B190	A101	confer with Anna regarding case status.	100.00	0.30	30.00
	GM B190	A101	Prepare a list of default cases to be listed on 6.12.2023; email Anna the same.	100.00	0.50	50.00
06/06/2023	AKM B190	A101	Emails with Greg Hauswirth regarding conference.	275.00	0.20	55.00
06/07/2023	RAP B190	A107	Telephone conference with G. Hauswirth regarding jury demand, legal theories and status.	500.00	0.50	250.00
06/12/2023	AKM B190	A101	Travel to/from court for 6/12 default judgment hearings.	275.00	0.60	165.00
06/19/2023	AKM B190	A101	In-office conference with Randall A. Pulman, W. Drew Mallender, G. Mankotia, and MaryAnn Villa regarding case status and next steps.	275.00	0.50	137.50
	AKM B190	A101	In-office strategy conference with Randall A. Pulman and Leslie S. Hyman.	275.00	1.50	412.50
	AKM B190	A101	Confer with Randall A. Pulman regarding case status and upcoming deadlines.	275.00	0.30	82.50
	LSH B190	A105	Conference with R. Pulman and A. MacFarlane regarding strategy on dispositive motions.	450.00	1.50	675.00



Lowe, Pat (dprt)

Statement No. 242980

Account No 1934.011

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(PSI) Potential Adversary Proceedings - Finders

				Rate	Hours	
	RAP	B190	A108	Review of draft of Motion for Summary Judgment; office conference with L. Hyman, A. MacFarlane and law clerk regarding law issues.	500.00	3.00 1,500.00
	WDM	B190	A105	Office conference with Randall A. Pulman, Anna MacFarlane and Gaurav Mankotia regarding status of adversary actions.	375.00	0.40 150.00
	GM	B190	A101	In-office conference with Randall A. Pulman, W. Drew Mallender, Anna, and MaryAnn Villa regarding case status and next steps.	100.00	0.50 50.00
06/20/2023	AKM	B190	A101	Email to Greg Murray regarding finalizing expert report.	275.00	0.10 27.50
	LSH	B190	A105	Communicate (in firm) with A. MacFarlane regarding summary judgment evidence and argument.	450.00	0.30 135.00
	RAP	B190	A108	Telephone conference with Hauswirth regarding mediation.	500.00	0.30 150.00
06/21/2023	AKM	B190	A101	Initial review of document requests from Hauswirth for various adversary proceedings.	275.00	0.50 137.50
	AKM	B190	A101	Review of memo prepared by Mike Colgan regarding parent-subsiary research.	275.00	0.50 137.50
	AKM	B190	A101	Office conference with Randall A. Pulman and Leslie S. Hyman regarding Motion for Summary Judgment issues.	275.00	0.30 82.50
06/26/2023	AKM	B190	A101	Office conferences with Randall A. Pulman (0.1) and G. Mankotia (0.1) regarding conferral call with Hauswirth via various motions to compel in multiple adversary proceedings.	275.00	0.20 55.00
06/27/2023	AKM	B190	A101	Confer with G. Mankotia regarding Texas finder registrations.	275.00	0.20 55.00
	RAP	B190	A104	Meeting and confer with opposing counsel regarding discovery issues.	500.00	1.00 500.00
	GM	B190	A101	Conferral phone call with Randall A.		

Lowe, Pat (dprt)

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(PSI) Potential Adversary Proceedings - Finders

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					Rate	Hours	
				Pulman, Anna and opposing counsel regarding defendant's RFP responses.	100.00	1.00	100.00
06/29/2023	AKM B190	A101	Office conference with Randall A. Pulman and G. Mankotia regarding Hauswirth client document production and Texas finders regulations.		275.00	0.20	55.00
	GM B190	A101	Research on Texas State Securities Rules and Regulations regarding finders; Office conference with Randall A. Pulman and Anna regarding Hauswirth client document production and Texas finders regulations.		100.00	3.00	300.00
07/10/2023	AKM B190	A101	Emails with Greg Hauswirth regarding conferral on multiple adversary proceedings.		275.00	0.30	82.50
07/11/2023	AKM B190	A101	Phone call with Greg Hauswirth conferring regarding discovery in multiple adversaries.		275.00	0.30	82.50
	AKM B190	A101	Multiple emails with Leslie S. Hyman and Greg Murray regarding expert report questions and updates.		275.00	0.80	220.00
07/17/2023	AKM B190	A101	Multiple office conferences with Randall A. Pulman regarding triggering creditor issue.		275.00	1.50	412.50
	AKM B190	A101	Office conference with Randall A. Pulman and Leslie S. Hyman regarding Motion for Summary Judgment strategy.		275.00	0.30	82.50
	AKM B190	A101	Office conference with Randall A. Pulman regarding status of all live adversaries.		275.00	0.50	137.50
	AKM B190	A101	Email and phone call to Greg Hauswirth regarding discovery.		275.00	0.30	82.50
	AKM B190	A101	Updating status chart in preparation for meeting with Randall A. Pulman.		275.00	1.00	275.00
	AKM B190	A101	Office conference with Randall A. Pulman and M. Colgan regarding parent/subsidiary transfer research.		275.00	0.30	82.50
	LSH B190	A105	Conference with R. Pulman regarding				

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(PSI) Potential Adversary Proceedings - Finders

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					Rate	Hours	
				strategy for motions for summary judgment.	450.00	0.80	360.00
	RAP	B190	A105	Office conference with staff regarding status of Finder's cases.	500.00	1.00	500.00
07/18/2023	AKM	B190	A101	Emails with Greg Hauswirth regarding one-week extension on discovery (various adversaries).	275.00	0.20	55.00
	AKM	B190	A101	Analysis of Policy Services, Inc. proof of claim chart and comparing with portal chart to match certificates with policies; confer with W. Drew Mallender and Randall A. Pulman regarding same; review of documents in file.	275.00	2.50	687.50
07/19/2023	AKM	B190	A101	Call with Greg Hauswirth regarding multiple adversaries & discovery status.	275.00	0.30	82.50
	AKM	B190	A101	Emails with Chris Turner regarding lapsed policies.	275.00	0.20	55.00
	AKM	B190	A101	Review proof of claim sheet prepared by M. Colgan; emails regarding same.	275.00	0.30	82.50
07/20/2023	AKM	B190	A101	Updating status chart per Randall A. Pulman and Leslie S. Hyman comments and edits.	275.00	1.50	412.50
07/21/2023	AKM	B190	A101	Review of Policy Services bank statements and cull and highlight samples for M. Colgan memorandum.	275.00	1.00	275.00
07/26/2023	AKM	B190	A101	Correspondence with G. Hauswirth regarding amended discovery and hardship affidavits/evidence.	275.00	0.30	82.50
	AKM	B190	A101	Begin preparing responses to written discovery (Hauswirth clients).	275.00	0.50	137.50
07/27/2023	AKM	B190	A101	Emails to/from Greg Hauswirth regarding discovery in multiple adversaries.	275.00	0.30	82.50
	AKM	B190	A101	Email to Leslie S. Hyman regarding pending discovery responses.	275.00	0.50	137.50
07/31/2023	AKM	B190	A101	Meeting with Randall A. Pulman and			

Lowe, Pat (dprt)

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(PSI) Potential Adversary Proceedings - Finders

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				Rate	Hours	
			Leslie S. Hyman regarding discovery (Hauswirth clients).	275.00	0.60	165.00
	AKM	B190	A101 Confer with G. Mankotia via email and in-office regarding preparing supplemental disclosures.	275.00	0.60	165.00
	AKM	B190	A101 Confer via phone and email with G. Hauswirth regarding discovery extensions and agreement to amend scheduling order.	275.00	0.50	137.50
	AKM	B190	A101 Attention to documents produced from Hauswirth.	275.00	0.50	137.50
08/01/2023	AKM	B190	A101 Review of Greg Murray expert report and confer with Leslie S. Hyman via email regarding revisions and updates to same; email to Greg Murray regarding same.	275.00	1.50	412.50
	AKM	B190	A101 Confer with Randall A. Pulman regarding default hearings.	275.00	0.50	137.50
	AKM	B190	A101 Email to G. Mankotia regarding second supplemental disclosures and written discovery.	275.00	0.10	27.50
	LSH	B190	A104 Review and identify edits to expert report of G. Murray.	450.00	1.30	585.00
08/02/2023	AKM	B190	A101 Emails to Greg Murray regarding additional revisions and clarifications required for expert report.	275.00	0.50	137.50
	AKM	B190	A101 Confer in-office with Randall A. Pulman regarding Hauswirth case mediation (0.2); call with Pat Lowe regarding same (0.1).	275.00	0.30	82.50
	RAP	B190	A108 Telephone conference with P. Lowe regarding choice of mediators.	500.00	0.20	100.00
08/08/2023	AKM	B190	A101 Emails to/from Greg Hauswirth (various adversaries) regarding hardship affidavits and supporting documents.	275.00	0.50	137.50
08/09/2023	AKM	B190	A101 In-office conference with M. Swanson regarding default judgments and collections strategy.	275.00	0.20	55.00
	RAP	B190	A104 Telephone conference with Lowe regarding collection of default judgment in out of state jurisdictions; office			

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(PSI) Potential Adversary Proceedings - Finders

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					Rate	Hours	
				conference with M. Swanson regarding same.	500.00	0.50	250.00
08/10/2023	RAP	B190	A104	Review of discovery response; office conference with L. Hyman and G. Mankotia regarding same.	500.00	1.00	500.00
	LSH	B190	A103	Draft form of verification for interrogatory responses.	450.00	0.40	180.00
08/11/2023	LSH	B190	A106	Review and respond to email from client regarding discovery.	450.00	0.10	45.00
08/15/2023	AKM	B190	A101	Email Greg Hauswirth (multiple adversaries) expert report by Greg Murray.	275.00	0.20	55.00
	AKM	B190	A101	Initial review of tax returns and financial statements from Greg Hauswirth; emails with G. Mankotia regarding same; confer with Randall A. Pulman regarding same.	275.00	1.00	275.00
08/17/2023	AKM	B190	A101	Attention to filing second joint motions to amend scheduling order (Hauswirth cases).	275.00	0.60	165.00
08/29/2023	RAP	B190	A104	Review of e-mails from lawyers regarding collection on default judgments; forward judgments to lawyers; e-mail to Lowe regarding same.	500.00	0.80	400.00
08/30/2023	AKM	B190	A101	Phone call with Greg Hauswirth regarding various adversaries; mediation; upcoming hearing.	275.00	0.20	55.00
	RAP	B190	A104	Telephone conference with P. Lowe regarding negotiations with purchasers and counsel regarding default judgment.	500.00	0.20	100.00
09/05/2023	AKM	B190	A101	Travel to/from courthouse for various hearings.	275.00	0.80	220.00
	AKM	B190	A101	Appear for and attend hearing on motion to strike jury demand (regarding: Blanchard, Cales, Cotton, Burke, INF, Nace, RD&J, Gandy, Wirth).	275.00	0.60	165.00

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(PSI) Potential Adversary Proceedings - Finders

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				Rate	Hours	
	AKM B190	A101	Emails to/from Greg Hauswirth regarding no objection to form of proposed orders.	275.00	0.20	55.00
09/12/2023	AKM B190	A101	Emails with Randall A. Pulman regarding second amended disclosures; review of client files regarding same (Hauswirth adversaries).	275.00	0.30	82.50
			For Legal Services Rendered		46.70	14,637.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	8.50	\$500.00	\$4,250.00
W. Drew Mallender	0.40	375.00	150.00
Anna K. MacFarlane	28.10	275.00	7,727.50
Gaurav Mankotia	5.30	100.00	530.00
Leslie Hyman	4.40	450.00	1,980.00

Advances

09/07/2023	B110	E102	Outside printing - Exhibit Notebooks for hearings - Blend Document Technologies #57736B	759.86
			Total Advances	759.86
			Total Current Work	15,397.36
			<b>Balance Due</b>	<b>\$15,397.36</b>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	759.86
B190	Other Contested Matters (excluding assumption/rejection motions)	14637.50	0.00
B100	Administration	14,637.50	759.86

Invoices are payable upon receipt.

# **EXHIBIT D-34**

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 Pat Lowe, Trustee  
 2402 E. Main St.  
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September 30, 2023

Invoice No. 242981  
 Account No. 1934.012

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Claims against Financial Horizon Concepts LLC - Finder

Fees

					Rate	Hours	
06/23/2023	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	4.00	400.00
06/29/2023	RAP	B190	A104	Review of document production; office conference with A. MacFarlane and G. Mankotia regarding finder theory.	500.00	0.50	250.00
06/30/2023	GM	B190	A101	Review RFP response; confer with Anna regarding same.	100.00	0.50	50.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
	AKM	B190	A108	Office conference with Randall A. Pulman regarding Motion for Summary Judgement.	275.00	0.20	55.00
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
08/02/2023	LSH	B190	A103	Continue drafting responses to discovery.	450.00	0.50	225.00
08/03/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as			



Lowe, Pat (dprt)

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Claims against Financial Horizon Concepts LLC - F

					Rate	Hours	
				proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	8.00	800.00
08/07/2023	LSH	B190	A103	Continue drafting discovery responses and identifying document production.	450.00	1.40	630.00
08/08/2023	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.60	270.00
08/09/2023	RAP	B190	A104	Review and edit of discovery answers and responses; review of documents produced by Burke and documents to be produced by Lowe.	500.00	2.50	1,250.00
08/10/2023	LSH	B190	A103	Continue drafting discovery responses.	450.00	0.40	180.00
08/11/2023	AKM	B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60	165.00
	GM	B190	A101	Prepare final written discovery responses and document production; email Anna the same.	100.00	0.50	50.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit list.	275.00	0.20	55.00
09/13/2023	AKM	B190	A101	Final review, signature, and service of 2nd Supplemental Rule 26(a) Disclosures on opposing counsel.	275.00	0.20	55.00
				For Legal Services Rendered		22.90	4,900.00

Recapitulation

Timekeeper	Hours	Rate	Total
Randall A. Pulman	3.20	\$500.00	\$1,600.00
Anna K. MacFarlane	1.80	275.00	495.00
Gaurav Mankotia	15.00	100.00	1,500.00

Lowe, Pat (dprt)

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Claims against Financial Horizon Concepts LLC - F

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Leslie Hyman	2.90	450.00	1,305.00

Total Current Work	4,900.00
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<b>Balance Due</b>	<b><u>\$4,900.00</u></b>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	4900.00	0.00
B100	Administration	4,900.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT**

## **D-13**

**No fees or  
expenses in  
this matter**

# **EXHIBIT**

## **D-14**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-37**

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September 30, 2023

Invoice No. 242982  
 Account No. 1934.015

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Claims against Financial Partners of America LLC - Finder

Fees

					Rate	Hours	
06/08/2023	GM	B190	A101	Review of documents and discovery; confer with Anna regarding same; relevant documents given to Anna.	100.00	4.00	400.00
	AKM	B190	A108	Confer with G. Monkotia regarding document production.	275.00	0.20	55.00
06/19/2023	AKM	B190	A101	Emails with opposing counsel regarding discovery extension and motion to extend scheduling order deadlines.	275.00	0.30	82.50
	AKM	B190	A101	Preparing motion to extend scheduling order deadlines.	275.00	0.50	137.50
06/21/2023	AKM	B190	A101	Review of email from opposing counsel regarding edits to amended agreed scheduling order; review of scheduling order.	275.00	0.50	137.50
06/22/2023	AKM	B190	A101	Multiple emails with opposing counsel regarding amended scheduling order.	275.00	0.50	137.50
	AKM	B190	A101	Continue drafting amended scheduling order per opposing counsel email.	275.00	0.20	55.00
	AKM	B190	A101	Begin drafting responses to discovery requests and analyzing production from defendants.	275.00	2.00	550.00
06/23/2023	AKM	B190	A101	Finalizing stipulation extending scheduling order deadlines; oversee filing of same.	275.00	0.50	137.50
	AKM	B190	A101	Confer with G. Mankotia regarding			

Lowe, Pat (dprt)

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Claims against Financial Partners of America LLC -

					Rate	Hours	
				discovery responses; initial review of same.	275.00	0.50	137.50
	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	3.00	300.00
06/26/2023	AKM	B190	A101	Reviewing document production; finalizing written responses for service per Randall A. Pulman comments and edits; serving RFP responses and documents on opposing counsel.	275.00	2.00	550.00
	RAP	B190	A104	Review and approval of discovery responses; office conference with A. MacFarlane regarding same.	500.00	0.20	100.00
06/27/2023	AKM	B190	A101	Email from opposing counsel regarding counteroffer and consideration of same; review of relevant documents from defendants' production.	275.00	1.20	330.00
	AKM	B190	A101	Confer with Randall A. Pulman regarding counteroffer.	275.00	0.20	55.00
	RAP	B190	A108	Confer with Anna MacFarlane regarding counter offer,	500.00	0.20	100.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
07/18/2023	AKM	B190	A101	Emails with opposing counsel regarding settlement and drafting paperwork regarding same.	275.00	0.30	82.50
07/24/2023	AKM	B190	A101	Drafting settlement agreement and ancillary documents.	275.00	1.50	412.50
07/31/2023	AKM	B190	A101	Continue drafting agreed judgment per Randall A. Pulman comments and edits.	275.00	0.50	137.50
	AKM	B190	A101	Email to opposing counsel with draft settlement documents.	275.00	0.20	55.00
08/02/2023	AKM	B190	A101	Emails to/from opposing counsel regarding draft settlement documents.	275.00	0.20	55.00

Lowe, Pat (dprt)

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Claims against Financial Partners of America LLC -

				Rate	Hours	
09/07/2023	AKM B190	A101	Correspondence with opposing counsel regarding draft settlement documents.	275.00	0.30	82.50
	AKM B190	A101	Review of opposing counsel suggested edits to settlement documents.	275.00	0.30	82.50
09/08/2023	AKM B190	A101	Correspondence with opposing counsel regarding settlement documents.	275.00	0.50	137.50
09/26/2023	AKM B190	A101	Emails to/from opposing counsel regarding settlement agreement.	275.00	0.30	82.50
09/28/2023	AKM B190	A101	Emails with opposing counsel regarding settlement and docket call.	275.00	0.30	82.50
09/29/2023	AKM B190	A101	Emails with opposing counsel regarding Monday docket call announcement.	275.00	0.30	82.50
			For Legal Services Rendered		20.90	4,657.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	13.30	275.00	3,657.50
Gaurav Mankotia	7.00	100.00	700.00

Total Current Work 4,657.50

**Balance Due** \$4,657.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	4657.50	0.00
B100	Administration	4,657.50	0.00

Invoices are payable upon receipt.



# **EXHIBIT D-38**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242983  
 Account No. 1934.016

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Claims against INF Solutions LLC - Finder

Fees

					Rate	Hours	
06/01/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Confer with G. Mankotia regarding comments to Motion to Strike.	500.00	0.20	100.00
06/07/2023	AKM	B190	A101	Call with Greg Hauswirth regarding adversary proceedings and scheduling issues.	275.00	0.50	137.50
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/21/2023	GM	B190	A101	Prepare Motion to Compel; confer with Randall A. Pulman regarding same.	100.00	5.00	500.00
	RAP	B190	A105	Confer with G. Mankotia regarding comments to Motion to Compel.	500.00	0.20	100.00
06/26/2023	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	4.00	400.00
	AKM	B190	A105	Confer with G. Mankotia regarding comments regarding discovery.	275.00	0.20	55.00
06/30/2023	GM	B190	A101	Prepare and finalize motion to compel			

Lowe, Pat (dprt)

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Claims against INF Solutions LLC - Finder

					Rate	Hours	
				along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
	RAP	B190	A105	Confer with G. Mankotia regarding comments to Motion to Compel.	500.00	0.20	100.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
	AKM	B190	A105	Confer with Randall A. Pulman regarding Motion for Summary Judgement.	275.00	0.20	55.00
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures; confer with G. Mankotia regarding same.	275.00	0.30	82.50
	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
08/04/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	8.00	800.00
08/08/2023	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	1.00	450.00
08/10/2023	LSH	B190	A103	Continue drafting discovery responses.	450.00	0.20	90.00
08/11/2023	AKM	B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60	165.00
	GM	B190	A101	Prepare final written discovery responses and document production.	100.00	0.50	50.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit			

Lowe, Pat (dprt)

Statement No. 242983  
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Claims against INF Solutions LLC - Finder

					Rate	Hours	
				list.	275.00	0.20	55.00
08/31/2023	AKM B190	A101	Attention to hearing issues.		275.00	0.20	55.00
	RAP B190	A104	Review and approval of witness and exhibit list; instructions to staff regarding same.		500.00	0.20	100.00
09/05/2023	RAP B190	A104	Prepare for hearing on Motion to Strike Jury Waiver; review of exhibits; appear at the hearing on behalf of Lowe, Trustee.		500.00	0.50	250.00
09/13/2023	AKM B190	A101	Final review, signature, and service of 2nd Supplemental Rule 26(a) Disclosures on opposing counsel.		275.00	0.20	55.00
			For Legal Services Rendered			30.90	4,582.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.50	\$500.00	\$750.00
Anna K. MacFarlane	2.70	275.00	742.50
Gaurav Mankotia	25.50	100.00	2,550.00
Leslie Hyman	1.20	450.00	540.00

Total Current Work 4,582.50

**Balance Due** \$4,582.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	4582.50	0.00
B100	Administration	4,582.50	0.00

Invoices are payable upon receipt.

# **EXHIBIT D-39**

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September 30, 2023

Invoice No. 242984  
 Account No. 1934.017

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Claims against GM Consultants Group Inc - Finder

Fees

					Rate	Hours	
06/07/2023	AKM	B190	A101	Review of witness and exhibit list; confer with Randall A. Pulman regarding same; filing same.	275.00	0.50	137.50
	RAP	B190	A105	Confer with Anna MacFarlane regarding witness and exhibit list.	500.00	0.20	100.00
06/12/2023	AKM	B190	A101	Appear for and attend default judgment hearing.	275.00	0.20	55.00
	AKM	B190	A101	Final review and upload of final default judgment.	275.00	0.50	137.50
	RAP	B190	A108	Attend hearing on Default Judgment.	500.00	0.50	250.00
	GM	B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
	GM	B190	A101	Calculate prejudgment interest rates and amend proposed order.	100.00	0.50	50.00
06/13/2023	AKM	B190	A101	Review of default judgment entered by court; emailing same to Pat Lowe.	275.00	0.20	55.00
	GM	B190	A101	Prepare post judgment discovery along with a letter; confer with Randall A. Pulman regarding same.	100.00	4.00	400.00
	RAP	B190	A105	Office conference with G. Mankotia regarding post judgement discovery.	500.00	0.20	100.00
06/15/2023	GM	B190	A101	Prepare final draft of post judgment discovery;.	100.00	0.50	50.00
06/20/2023	RAP	B190	A108	Review and signature of post judgment discovery and letter transmitting judgment.	500.00	0.50	250.00

Lowe, Pat (dprt)

Statement No. 242984  
Account No 1934.017  
Page: 2

Claims against GM Consultants Group Inc - Finder

					Rate	Hours	
08/09/2023	MS	B190	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50
08/29/2023	MS	B190	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
				For Legal Services Rendered		8.40	1,715.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.40	\$500.00	\$700.00
Anna K. MacFarlane	1.40	275.00	385.00
Gaurav Mankotia	5.20	100.00	520.00
Marshall Swanson	0.40	275.00	110.00

Total Current Work 1,715.00

**Balance Due** \$1,715.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	1715.00	0.00
B100	Administration	1,715.00	0.00

Invoices are payable upon receipt.

## **EXHIBIT D-3:**



**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242985  
 Account No. 1934.018

Page: 1

Claims against Candice Gillen - Net Winner

Fees

				Rate	Hours	
08/07/2023	AKM B190	A101	Emails to/from Candice Gillen regarding stipulation of dismissal.	275.00	0.20	55.00
08/16/2023	AKM B190	A101	Attention to emails with Defendant regarding case closure.	275.00	0.30	82.50
08/24/2023	AKM B190	A101	Emails to Candice Gillen regarding case closure and dismissal.	275.00	0.30	82.50
			For Legal Services Rendered		0.80	220.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	0.80	\$275.00	\$220.00

Total Current Work	220.00
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<b>Balance Due</b>	<b><u>\$220.00</u></b>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	220.00	0.00
B100	Administration	220.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT**

## **D-19**

**No fees or  
expenses in  
this matter**

# **EXHIBIT**

## **D-20**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-21**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242986  
 Account No. 1934.021

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Claims against D. Stein/Fidelity Mutual - Finder

Fees

					Rate	Hours	
06/06/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Confer with G. Mankotia regarding Motion to Strike Jury Demand.	500.00	0.20	100.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/28/2023	GM	B190	A101	Collate documents for discovery production.	100.00	3.00	300.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
	AKM	B190	A105	Confer with Randall A. Pulman regarding Motion for Summary Judgment, adversary status.	275.00	0.20	55.00
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
08/02/2023	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00

Lowe, Pat (dprt)

Statement No. 242986

Account No 1934.021

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Claims against D. Stein/Fidelity Mutual - Finder

					Rate	Hours	
	AKM	B190	A105	Confer with G. Mankotia regarding supplemental disclosures.	275.00	0.20	55.00
08/07/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	3.00	300.00
	RAP	B190	A104	Review of suggestion of bankruptcy filed by Defendant; instructions to staff.	500.00	0.20	100.00
08/08/2023	AKM	B190	A101	Attention to Darryl Stein bankruptcy; reviewing docket of same; confer with Randall A. Pulman regarding same.	275.00	0.30	82.50
	GM	B190	A101	Continue Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	3.00	300.00
	RAP	B190	A105	Office conference with Anna MacFarlane and G. Mankotia regarding discovery response.	500.00	0.30	150.00
08/15/2023	AKM	B190	A101	Confer with Randall A. Pulman regarding appearing in Chapter 7 case.	275.00	0.20	55.00
	RAP	B190	A105	Office conference with Anna MacFarlane regarding Chapter 7 case.	500.00	0.20	100.00
09/05/2023	AKM	B190	A101	Appear for Darryl Stein telephonic 341 meeting.	275.00	1.00	275.00
	AKM	B190	A101	Correspondence (phone & email) with trustee in Stein bankruptcy case.	275.00	0.20	55.00
	AKM	B190	A101	Confer with Randall A. Pulman regarding Stein 341 meeting.	275.00	0.20	55.00
	RAP	B190	A104	Attend Creditor Meeting.	500.00	1.00	500.00

Lowe, Pat (dprt)

Statement No. 242986

Account No 1934.021

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Claims against D. Stein/Fidelity Mutual - Finder

	Rate	Hours	
For Legal Services Rendered		21.20	3,415.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.10	\$500.00	\$1,050.00
Anna K. MacFarlane	2.60	275.00	715.00
Gaurav Mankotia	16.50	100.00	1,650.00

Total Current Work		3,415.00
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<b>Balance Due</b>	<u><u>\$3,415.00</u></u>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	3415.00	0.00
B100	Administration	3,415.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT D-22**



**PULMAN, CAPPUCINO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242987  
 Account No. 1934.022

Page: 1

Claims against McNamara Cap. Investmt Grp - Finder

Fees

					Rate	Hours	
08/09/2023	MS	B120	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50
08/29/2023	MS	B120	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
				For Legal Services Rendered		0.40	110.00

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Marshall Swanson	0.40	\$275.00	\$110.00

Total Current Work	110.00
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<b>Balance Due</b>	<b><u>\$110.00</u></b>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	110.00	0.00
B100	Administration	110.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT D-45**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242988  
 Account No. 1934.023

Page: 1

Claims against PGH Advisors - Finder

Fees

				Rate	Hours	
06/01/2023	AKM B190	A101	Finalizing Joint Motion to Amend Scheduling Order & Proposed Scheduling order for filing.	275.00	0.50	137.50
	AKM B190	A101	Phone call with opposing counsel regarding potential settlement options.	275.00	0.20	55.00
	AKM B190	A101	Phone call with Randall A. Pulman regarding call with opposing counsel.	275.00	0.10	27.50
	RAP B190	A105	Phone call with Anna MacFarlane to Opposing counsel.	500.00	0.10	50.00
06/05/2023	AKM B190	A101	Email to G. Mankotia regarding reviewing document production.	275.00	0.10	27.50
06/08/2023	AKM B190	A101	Confer with G. Mankotia regarding Defendants RFP responses.	275.00	0.20	55.00
	AKM B190	A101	Review of Hopman chapter 13 bankruptcy filing notice.	275.00	0.20	55.00
06/09/2023	AKM B190	A101	Confer with Randall A. Pulman regarding Hopman chapter 13 filing and discussion of related research.	275.00	0.30	82.50
	RAP B190	A108	Review of notice of Chapter 13 filing by Hoppman; office conference with A. MacFarlane regarding same.	500.00	0.20	100.00
06/12/2023	AKM B190	A101	Phone call with Randall A. Pulman and Catherine S. Curtis regarding chapter 13 issues.	275.00	0.20	55.00
	AKM B190	A101	Review of chapter 13 documents filed to			

Lowe, Pat (dprt)

Statement No. 242988

Account No 1934.023

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Claims against PGH Advisors - Finder

					Rate	Hours	
				date; confer with Randall A. Pulman regarding same.	275.00	0.50	137.50
06/23/2023	RAP	B190	A108	Review of schedules and Chapter 13 Plan; forward to P. Lowe.	500.00	0.50	250.00
06/26/2023	AKM	B190	A101	Emails with opposing counsel (0.2) and Pat Lowe (0.2) regarding final settlement wire transfer (MaRico Tippet & CWB).	275.00	0.40	110.00
07/05/2023	AKM	B190	A101	Review of settlement payments into estate; prepare stipulation of dismissal of Tippet & CWB.	275.00	0.80	220.00
	AKM	B190	A101	Emails to/from Pat Lowe regarding Tippet settlement payments.	275.00	0.20	55.00
	AKM	B190	A101	Email to Hopman attorney regarding stipulation and chapter 13 case.	275.00	0.20	55.00
	AKM	B190	A101	Attention to emails regarding Hopman chapter 13; review docket and attention to calendaring of deadlines.	275.00	0.60	165.00
07/06/2023	AKM	B190	A101	Emails with opposing counsel regarding stipulation of dismissal.	275.00	0.30	82.50
07/07/2023	AKM	B190	A101	Finalizing and filing stipulation of dismissal of Tippet & CWB.	275.00	0.50	137.50
07/11/2023	AKM	B190	A101	Multiple conferences with law clerk regarding ACC notice letter.	275.00	1.00	275.00
	LC3	B190	A102	Research how to sue Arizona Corporation Commission.	150.00	4.50	675.00
	LC3	B190	A103	Draft/revise Notice of Claim against ACC.	150.00	0.50	75.00
07/12/2023	AKM	B190	A101	Initial review of draft of notice to AZ CC prepared by law clerk.	275.00	0.30	82.50
	LC3	B190	A103	Draft/revise Notice of CLaim against ACC.	150.00	1.00	150.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00

Lowe, Pat (dprt)

Statement No. 242988

Account No 1934.023

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Claims against PGH Advisors - Finder

				Rate	Hours	
07/18/2023	AKM B190	A101	Continue drafting AZ CC notice letter.	275.00	1.50	412.50
	AKM B190	A101	Review of settlement offer letter from Hopman entities; email to Randall A. Pulman regarding same.	275.00	0.30	82.50
07/19/2023	AKM B190	A101	Appear for Hopman chapter 13 telephonic 341 Meeting.	275.00	0.50	137.50
	AKM B190	A101	Call with Randall A. Pulman and Hopman counsel post 341 meeting.	275.00	0.50	137.50
	AKM B190	A101	Multiple meetings and calls with Randall A. Pulman and Pat Lowe regarding Hopman case and settlement offer/counteroffer.	275.00	1.50	412.50
	AKM B190	A101	Confer with Randall A. Pulman and Pat Lowe regarding AZ Corporation Commission notice letter and issues.	275.00	0.60	165.00
	AKM B190	A101	Continue drafting AZ Corporation Commission Notice Letter per Randall A. Pulman comments.	275.00	0.50	137.50
	RAP B190	A108	Review of Chapter 13 plan and schedules; office conference with A. MacFarlane regarding same; review of settlement offer.	500.00	0.80	400.00
	RAP B190	A108	Appear at the Chapter 13 creditor's meeting - rescheduled.	500.00	0.50	250.00
	RAP B190	A108	Telephone conference with P. Lowe regarding settlement offers; office conference with A. MacFarlane regarding same.	500.00	0.70	350.00
07/20/2023	AKM B190	A101	Continue drafting notice letter to AZ CC per Randall A. Pulman comments and edits; finalize same to be sent out.	275.00	1.00	275.00
	AKM B190	A101	Drafting settlement letter to Hopman counsel.	275.00	0.80	220.00
	RAP B190	A104	Office conference with A. MacFarlane regarding settlement offer; review, edit and signature of settlement offer.	500.00	1.00	500.00
07/21/2023	AKM B190	A101	Attention to notice of reset 341 meeting.	275.00	0.10	27.50
	RAP B190	A104	Review, edit and signature of Notice of			

Lowe, Pat (dprt)

Statement No. 242988

Account No 1934.023

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Claims against PGH Advisors - Finder

					Rate	Hours	
				Claim to Arizona Corporations Commission regarding demand for payment of commissions collected by ACC from Hopman; office conference with A. MacFarlane regarding same.	500.00	0.50	250.00
08/08/2023	AKM	B190	A101	Phone call with Randall A. Pulman and Arizona Corporation Commission regarding notice letter.	275.00	0.60	165.00
	RAP	B190	A104	Office conference with A. MacFarlane and M. Villa regarding preparation of proof of claim; review and approval of same.	500.00	0.30	150.00
	RAP	B190	A104	Telephone conference with ACC regarding merits of claim for commissions.	500.00	0.50	250.00
08/09/2023	AKM	B190	A101	Review of settlement correspondence to/from Hopman's counsel.	275.00	0.50	137.50
08/15/2023	AKM	B190	A101	Confer with Randall A. Pulman regarding appearing in chapter 13 case.	275.00	0.20	55.00
	RAP	B190	A105	Confer with Anna MacFarlane regarding appearance in Chapter 13 case.	500.00	0.20	100.00
09/06/2023	AKM	B190	A101	Appear for and attend Zoom meeting of creditors in Hopman chapter 13 case.	275.00	0.30	82.50
	AKM	B190	A101	Attention to correspondence with opposing counsel regarding resolution.	275.00	0.30	82.50
	RAP	B190	A104	Attend Creditor Meeting.	500.00	0.50	250.00
	RAP	B190	A104	Telephone conference with Debtor's counsel regarding settlement offer.	500.00	0.50	250.00
09/08/2023	RAP	B190	A104	Review and signature of stipulation disallowing claim 13.	500.00	0.20	100.00
				For Legal Services Rendered		28.50	8,595.00

Recapitulation

Timekeeper	Hours	Rate	Total
Randall A. Pulman	6.70	\$500.00	\$3,350.00
Anna K. MacFarlane	15.80	275.00	4,345.00
Law Clerk (3)	6.00	150.00	900.00

Advances

07/20/2023	B110	E107	Fed Ex #817653344299	76.92
			Total Advances	76.92
			Total Current Work	8,671.92
			<b>Balance Due</b>	<b><u>\$8,671.92</u></b>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	76.92
B190	Other Contested Matters (excluding assumption/rejection motions)	8595.00	0.00
B100	Administration	8,595.00	76.92

Invoices are payable upon receipt.

# **EXHIBIT**

## **D-24**

**No fees or  
expenses in  
this matter**



# **EXHIBIT D-47**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242989  
 Account No. 1934.025

Page: 1

Claims against John M Vizy - Finder

Fees

				Rate	Hours		
06/07/2023	AKM	B190	A101	Review of witness and exhibit list; confer with Randall A. Pulman regarding same; filing same.	275.00	0.50	137.50
	RAP	B190	A105	Office conference with Anna MacFarlane regarding exhibit list.	500.00	0.20	100.00
06/12/2023	AKM	B190	A101	Appear for and attend default judgment hearing.	275.00	0.20	55.00
	AKM	B190	A101	Final review and upload of final default judgment.	275.00	0.50	137.50
	RAP	B190	A108	Attend hearing on Default Judgment.	500.00	0.50	250.00
	GM	B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
	GM	B190	A101	Calculate prejudgment interest rates and amend proposed order.	100.00	0.50	50.00
06/13/2023	AKM	B190	A101	Review of default judgment entered by court; emailing same to Pat Lowe.	275.00	0.20	55.00
	GM	B190	A101	Prepare post judgment discovery along with a letter; confer with Randall A. Pulman regarding same.	100.00	4.00	400.00
	RAP	B190	A105	Office conference with G. Mankotia regarding discovery,	500.00	0.20	100.00
06/15/2023	GM	B190	A101	Prepare final draft of post judgment discovery.	100.00	0.50	50.00
06/20/2023	RAP	B190	A108	Review and signature of post judgment discovery and letter transmitting judgment.	500.00	0.50	250.00

Lowe, Pat (dprt)

Statement No. 242989

Account No 1934.025

Page: 2

Claims against John M Vizy - Finder

					Rate	Hours	
08/09/2023	MS	B120	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50
08/29/2023	MS	B120	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
				For Legal Services Rendered		8.40	1,715.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.40	\$500.00	\$700.00
Anna K. MacFarlane	1.40	275.00	385.00
Gaurav Mankotia	5.20	100.00	520.00
Marshall Swanson	0.40	275.00	110.00

Total Current Work 1,715.00

**Balance Due** \$1,715.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	110.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1605.00	0.00
B100	Administration	1,715.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-48**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242990  
 Account No. 1934.026

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Claims against Mark Zabinski - Finder

Fees

				Rate	Hours	
06/05/2023	AKM B190	A101	Confer with Randall A. Pulman regarding motion to dismiss.	275.00	0.20	55.00
06/20/2023	AKM B190	A101	Draft response to motion to dismiss; confer with Leslie S. Hyman regarding same; conduct relevant legal research regarding same.	275.00	6.00	1,650.00
	AKM B190	A101	Confer with Randall A. Pulman regarding motion to dismiss issues and hearing.	275.00	0.20	55.00
	LSH B190	A105	Communicate (in firm) with A. MacFarlane regarding response to motion to dismiss.	450.00	0.30	135.00
06/21/2023	AKM B190	A101	Continue drafting motion to dismiss response per Randall A. Pulman comments and edits; filing same.	275.00	2.00	550.00
07/10/2023	AKM B190	A101	Plan and prepare for motion to dismiss hearing.	275.00	2.00	550.00
	AKM B190	A101	Appear for and attend motion to dismiss hearing.	275.00	0.50	137.50
	AKM B190	A101	Prepare order per Court's ruling; email to opposing counsel.	275.00	0.60	165.00
	AKM B190	A101	Phone call with opposing counsel regarding hearing.	275.00	0.10	27.50
	AKM B190	A101	Multiple conferences with Leslie S. Hyman regarding hearing and Court's ruling.	275.00	0.30	82.50
	LC3 B110	A102	Research caselaw regarding motion to			

Lowe, Pat (dprt)

Statement No. 242990

Account No 1934.026

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Claims against Mark Zabinski - Finder

					Rate	Hours	
				dismiss.	150.00	0.50	75.00
	LSH	B190	A105	Office conference with Anna MacFarlane regarding hearing.	450.00	0.30	135.00
07/11/2023	AKM	B190	A101	Finalizing and uploading order on motion to dismiss.	275.00	0.30	82.50
	AKM	B190	A101	Emails with Randall A. Pulman regarding proofs of claim strategy for amended complaint.	275.00	0.20	55.00
	AKM	B190	A101	Multiple conferences with law clerk regarding proofs of claim project.	275.00	0.50	137.50
	LC3	B190	A102	Research regarding proof of claim.	150.00	0.50	75.00
07/12/2023	AKM	B190	A101	Attention to order on motion to dismiss and emails regarding same.	275.00	0.30	82.50
07/14/2023	AKM	B190	A101	Review of chart prepared by law clerk M. Colgan; emails with M. Colgan regarding same.	275.00	0.50	137.50
07/17/2023	AKM	B190	A101	Phone call with opposing counsel regarding joint motion to amend scheduling order.	275.00	0.20	55.00
	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
07/18/2023	AKM	B190	A101	Drafting joint motion to extend scheduling order deadlines; emails with opposing counsel regarding same.	275.00	0.80	220.00
07/19/2023	AKM	B190	A101	Attention to filing motion to amend scheduling order.	275.00	0.20	55.00
07/26/2023	AKM	B190	A101	Draft second amended complaint; confer with Randall A. Pulman regarding same; oversee filing of same.	275.00	0.60	165.00
	RAP	B190	A104	Review of amended complaint; office conference with A. MacFarlane regarding same.	500.00	0.20	100.00
08/09/2023	AKM	B190	A101	Review defendant's motion to compel			

Lowe, Pat (dprt)

Statement No. 242990

Account No 1934.026

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Claims against Mark Zabinski - Finder

					Rate	Hours	
			arbitration.		275.00	0.30	82.50
	AKM	B190	A101	Confer with Randall A. Pulman regarding motion to compel arbitration; email motion to Pat Lowe.	275.00	0.20	55.00
	RAP	B190	A105	Office conference with Anna MacFarlane regarding Motion to Compel arbitration.	500.00	0.20	100.00
08/10/2023	RAP	B190	A104	Review of Motion to Compel Arbitration.	500.00	0.20	100.00
08/14/2023	AKM	B190	A101	Confer with G. Mankotia regarding initial disclosures.	275.00	0.10	27.50
	GM	B190	A101	Prepare 26(a) disclosures; confer with Anna regarding same; email Anna the same.	100.00	4.00	400.00
08/16/2023	AKM	B190	A101	Review of Rule 26 disclosures.	275.00	0.30	82.50
08/23/2023	AKM	B190	A101	Continue drafting Rule 26(a) disclosures; review of documents in file regarding same.	275.00	0.30	82.50
08/24/2023	AKM	B190	A101	Confer with Randall A. Pulman regarding initial disclosures and response to motion to compel arbitration.	275.00	0.20	55.00
	RAP	B190	A105	Confer with Anna MacFarlane regarding Motion to Compel arbitration.	500.00	0.20	100.00
08/25/2023	AKM	B190	A101	Drafting, finalizing, and serving Rule 26(a) disclosures and documents; multiple conferences with Randall A. Pulman regarding same.	275.00	1.00	275.00
	RAP	B190	A104	Review of disclosures; office conference with A. MacFarlane regarding same.	500.00	0.50	250.00
08/27/2023	AKM	B190	A101	Drafting Response to Motion to Compel Arbitration; conduct legal research regarding same.	275.00	8.00	2,200.00
08/28/2023	AKM	B190	A101	Continue drafting Response to Motion to Compel; confer with Randall A. Pulman regarding same; continue drafting per Randall A. Pulman comments and edits;			

Lowe, Pat (dprt)

Statement No. 242990

Account No 1934.026

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Claims against Mark Zabinski - Finder

					Rate	Hours	
				conduct relevant legal research regarding same.	275.00	7.50	2,062.50
	RAP	B190	A104	Office conference with A. MacFarlane regarding response to Motion to Compel Arbitration and legal theories; review and edit of draft.	500.00	1.00	500.00
08/29/2023	LSH	B190	A103	Continue drafting response to motion to compel arbitration including legal research for same.	450.00	4.00	1,800.00
	AKM	B190	A101	Continue drafting Response per Leslie S. Hyman comments and edits; continue legal research regarding same.	275.00	3.50	962.50
	RAP	B190	A104	Review and edit of Response to Motion to Arbitrate.	500.00	1.00	500.00
08/30/2023	AKM	B190	A101	Continue drafting response to motion to compel arbitration per Randall A. Pulman and Leslie S. Hyman comments and edits; conduct relevant legal research regarding same; confer with Randall A. Pulman and Leslie S. Hyman regarding same.	275.00	3.70	1,017.50
	AKM	B190	A101	Final review and filing of response.	275.00	0.20	55.00
	RAP	B190	A104	Final review and approval of response to Motion to Compel Arbitration; office conference with A. MacFarlane regarding same.	500.00	0.50	250.00
	LSH	B120	A103	Continue drafting response to motion to compel arbitration.	450.00	0.70	315.00
08/31/2023	RAP	B190	A104	Review and approval of witness and exhibit list; instructions to staff regarding same.	500.00	0.20	100.00
09/05/2023	AKM	B190	A101	Appear for and attend hearing on Motion to Compel Arbitration.	275.00	0.50	137.50
	AKM	B190	A101	Prepare order denying motion to compel arbitration.	275.00	0.20	55.00
	AKM	B190	A101	Email to opposing counsel for approval of draft order.	275.00	0.10	27.50
	RAP	B190	A104	Prepare for hearing on Motion to Compel Arbitration; review of case law; appear at			



Lowe, Pat (dprt)

Statement No. 242990

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Claims against Mark Zabinski - Finder

				Rate	Hours	
			hearing on behalf of Lowe, Trustee on hearing.	500.00	2.00	1,000.00
09/06/2023	AKM B190	A101	Emails to/from opposing counsel regarding form of order denying motion to compel arbitration.	275.00	0.20	55.00
09/07/2023	AKM B190	A101	Attention to opposing counsel redlines to order denying motion to compel arbitration; finalizing same for filing.	275.00	0.30	82.50
09/15/2023	AKM B190	A101	Review of Notice of Appeal.	275.00	0.20	55.00
	AKM B190	A101	Initial review of Motion for stay pending appeal.	275.00	0.20	55.00
09/18/2023	AKM B190	A101	Confer with Randall A. Pulman regarding appeal.	275.00	0.20	55.00
	AKM B190	A101	Continue review of motion for stay pending appeal.	275.00	0.40	110.00
			For Legal Services Rendered		59.60	17,887.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	6.20	\$500.00	\$3,100.00
Anna K. MacFarlane	43.10	275.00	11,852.50
Gaurav Mankotia	4.00	100.00	400.00
Law Clerk (3)	1.00	150.00	150.00
Leslie Hyman	5.30	450.00	2,385.00

Total Current Work 17,887.50

**Balance Due** \$17,887.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	75.00	0.00
B120	Asset Analysis and Recovery	315.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	17497.50	0.00
B100	Administration	17,887.50	0.00

Lowe, Pat (dprt)

Statement No. 242990

Account No 1934.026

Claims against Mark Zabinski - Finder

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Invoices are payable upon receipt.

# **EXHIBIT'D-49**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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 Pat Lowe, Trustee  
 2402 E. Main St.  
 Uvalde, TX 78801

September 30, 2023

Invoice No. 242991  
 Account No. 1934.027

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Metropolitan CMB/Wiley Carter - Finder

Fees

					Rate	Hours	
08/09/2023	MS	B120	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50
08/29/2023	MS	B120	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
09/25/2023	MS	B120	A103	Draft/revise Abstract of Judgment.	275.00	1.00	275.00
09/27/2023	MS	B120	A111	Attention to recording of Abstract of Judgment.	275.00	0.20	55.00
				For Legal Services Rendered		1.60	440.00

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Marshall Swanson	1.60	\$275.00	\$440.00

Total Current Work 440.00

**Balance Due** \$440.00

Lowe, Pat (dprt)

Statement No. 242991

Account No 1934.027

Metropolitan CMB/Wiley Carter - Finder

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	440.00	0.00
B100	Administration	440.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-4:**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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 Uvalde, TX 78801

September 30, 2023

Invoice No. 242992  
 Account No. 1934.028

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Claims against Purpose Driven Fin. Svcs - Finder

Fees

					Rate	Hours	
06/12/2023	AKM	B190	A101	Appear for and attend default judgment hearing to inform court of settlement and upcoming 9019 motion.	275.00	0.20	55.00
08/09/2023	MS	B120	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50
08/29/2023	MS	B120	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
09/05/2023	AKM	B190	A101	Attention to letter from Zaheer Razack; review file and confer with Randall A. Pulman regarding same.	275.00	0.50	137.50
				For Legal Services Rendered		1.10	302.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	0.70	\$275.00	\$192.50
Marshall Swanson	0.40	275.00	110.00

Total Current Work 302.50

Lowe, Pat (dprt)

Statement No. 242992

Account No 1934.028

Claims against Purpose Driven Fin. Svcs - Finder

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**Balance Due**

\$302.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	110.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	192.50	0.00
B100	Administration	302.50	0.00

Invoices are payable upon receipt.



**EXHIBIT'D-4;**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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 Uvalde, TX 78801

September 30, 2023

Invoice No. 242993  
 Account No. 1934.029

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Claims against Premier Group Enterpr. - Finder

Fees

				Rate	Hours	
06/05/2023	AKM B190	A101	Prepare advisory to court regarding settlement.	275.00	0.50	137.50
06/06/2023	AKM B190	A101	Prepare settlement agreement; transmit settlement agreement to defendant for signature.	275.00	1.10	302.50
	RAP B190	A107	Review and signature of Settlement Offer Letter.	500.00	0.20	100.00
06/07/2023	AKM B190	A101	Emails with defendant regarding signing settlement agreement and mailing check.	275.00	0.20	55.00
06/12/2023	AKM B190	A101	Emails to/from defendant regarding signed settlement agreement and first payment.	275.00	0.20	55.00
	AKM B190	A101	Email to Pat Lowe regarding settlement.	275.00	0.20	55.00
	GM B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
07/24/2023	AKM B190	A101	Continue drafting stipulation; email to defendant regarding signing same.	275.00	0.50	137.50
08/02/2023	AKM B190	A101	Finalizing and signing stipulation of dismissal for filing.	275.00	0.30	82.50
			For Legal Services Rendered		3.40	945.00

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00

Lowe, Pat (dprt)

Statement No. 242993

Account No 1934.029

Claims against Premier Group Enterpr. - Finder

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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	3.00	275.00	825.00
Gaurav Mankotia	0.20	100.00	20.00

Total Current Work	945.00
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<b>Balance Due</b>	<b><u>\$945.00</u></b>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	945.00	0.00
B100	Administration	945.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-52**

**PULMAN, CAPPUCIO & PULLEN, LLP**

Attorneys &amp; Counselors

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 Uvalde, TX 78801

September 30, 2023

Invoice No. 242994  
 Account No. 1934.030

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Claims against Dennis Wirth, Agent Advisory Group

Fees

					Rate	Hours	
06/05/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Confer with G. Mankotia regarding exhibit on Motion to Strike.	500.00	0.20	100.00
06/08/2023	GM	B190	A101	Confer with Randall A. Pulman regarding motion to compel; further confer with Anna regarding same.	100.00	0.50	50.00
	RAP	B190	A105	Office conference with G. Mankotia regarding motion to compel.	500.00	0.20	100.00
	AKM	B190	A105	Office conference with G. Mankotia regarding Motion to compel.	275.00	0.20	55.00
06/09/2023	GM	B190	A101	Prepare motion to compel.	100.00	5.00	500.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/19/2023	AKM	B190	A101	Confer with G. Mankotia regarding draft motion to compel and advising on conferral email regarding same.	275.00	0.30	82.50
	RAP	B190	A108	Review of Motion to Compel; office conference with G. Mankotia regarding final edits; forward to opposing counsel			

Lowe, Pat (dprt)

Statement No. 242994

Account No 1934.030

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Claims against Dennis Wirth, Agent Advisory Grou

					Rate	Hours	
				for conferral purposes.	500.00	1.00	500.00
06/20/2023	AKM	B190	A101	Attention to emails regarding discovery issues.	275.00	0.30	82.50
	GM	B190	A101	Continue prepare Motion to Compel; Confer with Randall A. Pulman regarding same.	100.00	1.00	100.00
06/27/2023	AKM	B190	A101	Conference call with Randall A. Pulman and opposing counsel regarding defendant's RFP responses.	275.00	1.00	275.00
	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	3.00	300.00
	RAP	B190	A105	Conference call with Opposing counsel regarding defendants requests for production responses.	500.00	1.00	500.00
06/30/2023	GM	B190	A101	Prepare and finalize motion to compel along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
	RAP	B190	A104	Review and signature of Motion to compel.	500.00	0.30	150.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
08/02/2023	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
08/08/2023	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.90	405.00
08/09/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments;			

Lowe, Pat (dprt)

Statement No. 242994

Account No 1934.030

Claims against Dennis Wirth, Agent Advisory Grou

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					Rate	Hours	
				multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	8.00	800.00
	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	1.00	450.00
08/10/2023	LSH	B190	A103	Continue drafting discovery responses.	450.00	0.30	135.00
08/11/2023	AKM	B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60	165.00
	GM	B190	A101	Prepare final written discovery responses and document production; email Anna the same.	100.00	0.50	50.00
08/21/2023	LSH	B190	A103	Begin drafting motion for summary judgment.	450.00	5.00	2,250.00
08/22/2023	LSH	B190	A103	Continue drafting motion for summary judgment.	450.00	1.10	495.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit list.	275.00	0.20	55.00
08/31/2023	RAP	B190	A104	Review and approval of witness and exhibit list; instructions to staff regarding same.	500.00	0.20	100.00
09/05/2023	RAP	B190	A104	Prepare for hearing on Motion to Strike Jury Waiver; review of exhibits; appear at the hearing on behalf of Lowe, Trustee.	500.00	0.50	250.00
09/13/2023	AKM	B190	A101	Final review, signature, and service of 2nd Supplemental Rule 26(a) Disclosures on opposing counsel.	275.00	0.20	55.00
				For Legal Services Rendered		41.30	9,070.00

Lowe, Pat (dprt)

Statement No. 242994

Account No 1934.030

Claims against Dennis Wirth, Agent Advisory Grou

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# Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	3.60	\$500.00	\$1,800.00
Anna K. MacFarlane	3.40	275.00	935.00
Gaurav Mankotia	26.00	100.00	2,600.00
Leslie Hyman	8.30	450.00	3,735.00

Total Current Work	9,070.00
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<b>Balance Due</b>	<b><u>\$9,070.00</u></b>
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# Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	9070.00	0.00
B100	Administration	9,070.00	0.00

Invoices are payable upon receipt.



# **EXHIBIT'D-53**

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 Uvalde, TX 78801

September 30, 2023

Invoice No. 242995  
 Account No. 1934.031

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Claims against Michael Cales - Finder

Fees

					Rate	Hours	
06/05/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Office conference with G. Mankotia regarding Motion to Strike.	500.00	0.20	100.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/19/2023	GM	B190	A101	Prepare Motion to Compel; confer with Randall A. Pulman regarding same.	100.00	5.00	500.00
06/21/2023	RAP	B190	A108	Review of Motion to Compel; office conference with G. Mankotia regarding same.	500.00	0.10	50.00
06/28/2023	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	3.00	300.00
06/30/2023	GM	B190	A101	Prepare and finalize motion to compel along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane			

Lowe, Pat (dprt)

Statement No. 242995

Account No 1934.031

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Claims against Michael Cales - Finder

				Rate	Hours	
			regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
	AKM B190	A105	Office conference with Randall A. Pulman regarding status of motion for summary judgement.	275.00	0.20	55.00
07/27/2023	AKM B190	A101	Drafting responses to Interrogatories, RFAs, and RFPs; review documents in file regarding same.	275.00	8.00	2,200.00
	AKM B190	A101	Confer Randall A. Pulman and Leslie S. Hyman regarding discovery.	275.00	0.30	82.50
07/28/2023	AKM B190	A101	Continue drafting discovery responses per Randall A. Pulman comments and edits.	275.00	1.50	412.50
07/31/2023	LSH B190	A103	Continue drafting responses to discovery and gathering responsive documents.	450.00	3.10	1,395.00
08/01/2023	AKM B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
	LSH B190	A104	Continue reviewing documents for production and revising discovery responses.	450.00	1.80	810.00
08/02/2023	AKM B190	A101	Confer with Leslie S. Hyman and G. Mankotia in person and via email regarding discovery requests and document production; review client files regarding same.	275.00	0.80	220.00
	GM B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
	LSH B190	A103	Continue drafting responses to discovery and searching for responsive documents.	450.00	1.20	540.00
08/09/2023	LSH B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.70	315.00
08/10/2023	LSH B190	A103	Continue drafting discovery responses.	450.00	0.20	90.00
08/11/2023	AKM B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50

Lowe, Pat (dprt)

Statement No. 242995

Account No 1934.031

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Claims against Michael Cales - Finder

				Rate	Hours	
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60 165.00
	GM	B190	A101	Prepare final written discovery responses and document production; email Anna the same.	100.00	0.50 50.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit list.	275.00	0.20 55.00
08/31/2023	RAP	B190	A104	Review and approval of witness and exhibit list; instructions to staff regarding same.	500.00	0.20 100.00
09/05/2023	RAP	B190	A104	Prepare for hearing on Motion to Strike Jury Waiver; review of exhibits; appear at the hearing on behalf of Lowe, Trustee.	500.00	0.50 250.00
				For Legal Services Rendered		36.90 8,755.00

# Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.20	\$500.00	\$600.00
Anna K. MacFarlane	12.20	275.00	3,355.00
Gaurav Mankotia	16.50	100.00	1,650.00
Leslie Hyman	7.00	450.00	3,150.00

Total Current Work 8,755.00

**Balance Due** \$8,755.00

# Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	8755.00	0.00
B100	Administration	8,755.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-54**

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September 30, 2023

Invoice No. 242996  
 Account No. 1934.032

Page: 1

Claims against George M Villa - Finder

Fees

					Rate	Hours	
08/09/2023	MS	B120	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50
08/29/2023	MS	B120	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
				For Legal Services Rendered		0.40	110.00

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Marshall Swanson	0.40	\$275.00	\$110.00

Total Current Work	110.00
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<b>Balance Due</b>	<b><u>\$110.00</u></b>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	110.00	0.00
B100	Administration	110.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-55**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242997  
 Account No. 1934.033

Page: 1

Claims against Randy Seymour - Finder

Fees

				Rate	Hours	
06/07/2023	AKM B190	A101	Review of witness and exhibit list; confer with Randall A. Pulman regarding same; filing same.	275.00	0.50	137.50
	RAP B190	A105	Confer with Anna MacFarlane regarding witness and exhibit list.	500.00	0.20	100.00
06/12/2023	AKM B190	A101	Appear for and attend default judgment hearing.	275.00	0.20	55.00
	RAP B190	A108	Attend hearing on Default Judgment.	500.00	0.50	250.00
	GM B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
	GM B190	A101	Calculate prejudgment interest rates and amend proposed order.	100.00	0.50	50.00
06/13/2023	AKM B190	A101	Review of default judgment entered by court; emailing same to Pat Lowe.	275.00	0.20	55.00
06/14/2023	GM B190	A101	Prepare post judgment discovery along with a letter; confer with Randall A. Pulman regarding same.	100.00	4.00	400.00
	RAP B190	A105	Office conference with G. Mankotia regarding post judgement discovery.	500.00	1.00	500.00
06/15/2023	GM B190	A101	Prepare final draft of post judgment discovery.	100.00	0.50	50.00
06/20/2023	RAP B190	A108	Review and signature of post judgment discovery and letter transmitting judgment.	500.00	0.50	250.00



Lowe, Pat (dprt)

Statement No. 242997

Account No 1934.033

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Claims against Randy Seymour - Finder

					Rate	Hours	
08/09/2023	MS	B120	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50
08/29/2023	MS	B120	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
				For Legal Services Rendered		8.70	1,977.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.20	\$500.00	\$1,100.00
Anna K. MacFarlane	0.90	275.00	247.50
Gaurav Mankotia	5.20	100.00	520.00
Marshall Swanson	0.40	275.00	110.00

Total Current Work 1,977.50

**Balance Due** \$1,977.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	110.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1867.50	0.00
B100	Administration	1,977.50	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-56**

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September 30, 2023

Invoice No. 242998  
 Account No. 1934.034

Page: 1

Claims against Raul T Gomez - Finder

Fees

				Rate	Hours	
06/05/2023	AKM B190	A101	Attention to returned mail issues; researching probate records; confer with Randall A. Pulman regarding same.	275.00	0.50	137.50
	RAP B190	A105	Office conference with Anna MacFarlane regarding research of probate records.	500.00	0.20	100.00
06/06/2023	AKM B190	A101	Begin preparing motion to continue default hearing; confer with Randall A. Pulman regarding probate.	275.00	0.50	137.50
06/12/2023	AKM B190	A101	Appear for and attend default judgment hearing to inform court that defendant is deceased and we are working on getting in contact with the probate attorney.	275.00	0.10	27.50
	GM B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
07/17/2023	AKM B190	A101	Email and phone call to probate attorney.	275.00	0.30	82.50
07/27/2023	AKM B190	A101	Emails to/from David Bradley regarding Gomez estate inventory.	275.00	0.20	55.00
08/02/2023	AKM B190	A101	Emails to/from D. Bradley regarding Gomez probate estate.	275.00	0.20	55.00
08/07/2023	AKM B190	A101	Appear for default judgment hearing to provide status update to court; hearing reset to 10/2 at 2pm.	275.00	0.20	55.00
	AKM B190	A101	Emails with D. Bradley regarding inventory.	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 242998

Account No 1934.034

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Claims against Raul T Gomez - Finder

					Rate	Hours	
	GM	B190	A101	Attend default judgment hearing through video mode.	100.00	0.20	20.00
09/29/2023	AKM	B190	A101	Attention to emails with probate counsel.	275.00	0.20	55.00
				For Legal Services Rendered		3.00	800.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	2.40	275.00	660.00
Gaurav Mankotia	0.40	100.00	40.00

Advances

06/05/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00
			Total Current Work	805.00

**Balance Due** \$805.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	5.00
B190	Other Contested Matters (excluding assumption/rejection motions)	800.00	0.00
B100	Administration	800.00	5.00

Invoices are payable upon receipt.

# **EXHIBIT'D-57**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 242999  
 Account No. 1934.035

Page: 1

Claims against RD and J, Inc. - Finder

Fees

					Rate	Hours	
06/01/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Office conference with G. Mankotia regarding Motion to Strike Jury Demand.	500.00	0.20	100.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/21/2023	GM	B190	A101	Prepare Motion to Compel; confer with Randall A. Pulman regarding same.	100.00	5.00	500.00
	RAP	B190	A105	Office conference with G. Mankotia regarding Motion to Compel.	500.00	0.20	100.00
06/26/2023	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	4.00	400.00
	AKM	B190	A105	Confer with G. Mankotia regarding production of documents.	275.00	0.20	55.00
06/30/2023	GM	B190	A101	Prepare and finalize motion to compel along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
	RAP	B190	A105	Office conference with G. Mankotia regarding motion to compel.	500.00	0.20	100.00

Lowe, Pat (dprt)

Statement No. 242999

Account No 1934.035

Page: 2

Claims against RD and J, Inc. - Finder

					Rate	Hours	
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
08/07/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	8.00	800.00
08/08/2023	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.60	270.00
08/09/2023	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.40	180.00
08/10/2023	LSH	B190	A103	Continue drafting discovery responses.	450.00	0.30	135.00
08/11/2023	AKM	B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60	165.00
	GM	B190	A101	Prepare final written discovery responses and document production; email Anna the same.	100.00	0.50	50.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit list.	275.00	0.20	55.00
08/31/2023	RAP	B190	A104	Review and approval of witness and			

Lowe, Pat (dprt)

Statement No. 242999

Account No 1934.035

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Claims against RD and J, Inc. - Finder

					Rate	Hours	
				exhibit list; instructions to staff regarding same.	500.00	0.20	100.00
09/05/2023	RAP	B190	A104	Prepare for hearing on Motion to Strike Jury Waiver; review of exhibits; appear at the hearing on behalf of Lowe, Trustee.	500.00	0.50	250.00
09/13/2023	AKM	B190	A101	Final review, signature, and service of 2nd Supplemental Rule 26(a) Disclosures on opposing counsel.	275.00	0.20	55.00
				For Legal Services Rendered		30.10	4,380.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.50	\$500.00	\$750.00
Anna K. MacFarlane	1.80	275.00	495.00
Gaurav Mankotia	25.50	100.00	2,550.00
Leslie Hyman	1.30	450.00	585.00

Total Current Work 4,380.00

**Balance Due** \$4,380.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	4380.00	0.00
B100	Administration	4,380.00	0.00

Invoices are payable upon receipt.



# **EXHIBIT'D-58**

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September 30, 2023

Invoice No. 243000  
 Account No. 1934.036

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Claims against David Rosen - Finder

Fees

				Rate	Hours	
07/12/2023	AKM	B190	A101 Multiple emails and phone calls to defendant.	275.00	0.30	82.50
			For Legal Services Rendered		0.30	82.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	0.30	\$275.00	\$82.50

Advances

07/12/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00
			Total Current Work	87.50

**Balance Due** \$87.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	5.00
B190	Other Contested Matters (excluding assumption/rejection motions)	82.50	0.00
B100	Administration	82.50	5.00

Invoices are payable upon receipt.

# **EXHIBIT**

**D-37**

**No fees or  
expenses in  
this matter**

# **EXHIBIT'D-5:**

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September 30, 2023

Invoice No. 243001  
 Account No. 1934.038

Page: 1

Claims against Crissman Crombie

Fees

				Rate	Hours	
06/19/2023	AKM B190	A101	Phone call with defendant regarding case.	275.00	0.30	82.50
06/20/2023	AKM B190	A101	Confer with Randall A. Pulman regarding docket call and required actions.	275.00	0.30	82.50
	RAP B190	A105	Confer with Anna MacFarlane regarding docket call.	500.00	0.30	150.00
06/28/2023	AKM B190	A101	Begin drafting FOF/COL and Pre-Trial Order.	275.00	2.00	550.00
06/29/2023	AKM B190	A101	Continue drafting FOF/COL, Joint Pre-Trial Order, and trial witness/exhibit list; review of documents in file regarding same.	275.00	6.00	1,650.00
06/30/2023	AKM B190	A101	Continue drafting FOF/COL, JPTO and exhibit list per Randall A. Pulman comments and edits; continue review of documents in file.	275.00	2.60	715.00
	AKM B190	A101	Multiple phone calls, emails, and meetings regarding settlement; settlement reached.	275.00	1.70	467.50
	RAP B190	A108	Telephone conference with opposing counsel regarding settlement; office conference with A. MacFarlane regarding same; telephone conference with P. Lowe regarding same.	500.00	0.80	400.00
	RAP B190	A108	Review and edit of draft of Joint Pre-trial order; office conference with A.			

Lowe, Pat (dprt)

Statement No. 243001

Account No 1934.038

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Claims against Crissman Crombie

					Rate	Hours	
				MacFarlane regarding same.	500.00	0.50	250.00
07/02/2023	AKM B190	A101	Draft settlement agreement and agreed judgment.		275.00	1.50	412.50
07/05/2023	AKM B190	A101	Email settlement agreement documents to Crombie for signature.		275.00	0.30	82.50
	RAP B190	A104	Review and signature of settlement offer.		500.00	0.20	100.00
07/06/2023	AKM B190	A101	Preparing advisory to court regarding settlement; filing and serving same.		275.00	1.00	275.00
	AKM B190	A101	Emails regarding settlement agreement; review executed document.		275.00	0.40	110.00
07/10/2023	AKM B190	A101	Appear for docket call; announce settlement.		275.00	0.20	55.00
07/20/2023	AKM B190	A101	Emails with defendant regarding check.		275.00	0.30	82.50
08/07/2023	AKM B190	A101	Appear for docket call.		275.00	0.10	27.50
	GM B190	A101	Attend hearing through video mode.		100.00	0.10	10.00
08/18/2023	AKM B190	A101	Attention to settlement payments.		275.00	0.30	82.50
			For Legal Services Rendered			18.90	5,585.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.80	\$500.00	\$900.00
Anna K. MacFarlane	17.00	275.00	4,675.00
Gaurav Mankotia	0.10	100.00	10.00

Total Current Work 5,585.00

**Balance Due** \$5,585.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	5585.00	0.00
B100	Administration	5,585.00	0.00

Lowe, Pat (dprt)

Statement No. 243001

Account No 1934.038

Claims against Crissman Crombie

Page: 3

Invoices are payable upon receipt.

**EXHIBIT'D-5;**



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September 30, 2023

Invoice No. 243002  
 Account No. 1934.039

Page: 1

Claims against Agents Insur. Sales &amp; Svc - Finder

Fees

				Rate	Hours	
06/06/2023	AKM B190	A101	Transmit settlement agreement to defendant for signature.	275.00	0.10	27.50
	RAP B190	A107	Review and signature of Settlement Offer Letter.	500.00	0.20	100.00
06/13/2023	AKM B190	A101	Emails with defendant Wilken regarding check and signed settlement agreement.	275.00	0.30	82.50
06/14/2023	AKM B190	A101	Attention to Wilken settlement; emails regarding same.	275.00	0.30	82.50
06/20/2023	AKM B190	A101	Emails to/from David Obmann regarding settlement checks.	275.00	0.20	55.00
07/06/2023	AKM B190	A101	Preparing advisory to court regarding settlement; filing and serving same.	275.00	1.00	275.00
07/10/2023	AKM B190	A101	Appear for docket call; announce settlement.	275.00	0.20	55.00
07/24/2023	AKM B190	A101	Continue drafting stipulation; emails to defendants regarding signing same.	275.00	0.50	137.50
07/25/2023	AKM B190	A101	Multiple emails with David Obmann and Barry Wilken regarding stipulation of dismissal.	275.00	0.50	137.50
07/26/2023	AKM B190	A101	Finalizing and filing stipulation of dismissal.	275.00	0.60	165.00

Lowe, Pat (dprt)

Statement No. 243002

Account No 1934.039

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Claims against Agents Insur. Sales & Svc - Finder

				Rate	Hours	
08/08/2023	AKM	B190	A101			
			Emails with D. Obmann regarding closure of case.	275.00	0.20	55.00
			For Legal Services Rendered		4.10	1,172.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	3.90	275.00	1,072.50

Total Current Work 1,172.50

**Balance Due** \$1,172.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	1172.50	0.00
B100	Administration	1,172.50	0.00

Invoices are payable upon receipt.

# **EXHIBIT**

## **D-40**

**No fees or  
expenses in  
this matter**

# **EXHIBIT**

## **D-41**

**No fees or  
expenses in  
this matter**

# **EXHIBIT D-44**

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September 30, 2023

Invoice No. 243003  
 Account No. 1934.042

Page: 1

Claims against Shantell Wright - Finder

Fees

				Rate	Hours		
06/12/2023	AKM	B190	A101	Appear for and attend default judgment hearing.	275.00	0.20	55.00
	AKM	B190	A101	Final review and upload of final default judgment.	275.00	0.50	137.50
	RAP	B190	A108	Attend hearing on Default Judgment.	500.00	0.50	250.00
	GM	B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
	GM	B190	A101	Calculate prejudgment interest rates and amend proposed order.	100.00	0.50	50.00
06/13/2023	AKM	B190	A101	Review of default judgment entered by court; emailing same to Pat Lowe.	275.00	0.20	55.00
06/15/2023	GM	B190	A101	Prepare post judgment discovery; confer with Randall A. Pulman regarding same.	100.00	4.00	400.00
	GM	B190	A101	Prepare final draft of post judgment discovery.	100.00	0.50	50.00
	RAP	B190	A105	Confer with G. Mankotia regarding post judgement discovery.	500.00	0.20	100.00
06/20/2023	RAP	B190	A108	Review and signature of post judgment discovery and letter transmitting judgment.	500.00	0.50	250.00
08/09/2023	MS	B120	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50

Lowe, Pat (dppt)

Statement No. 243003

Account No 1934.042

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Claims against Shantell Wright - Finder

					Rate	Hours	
08/29/2023	MS	B120	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
				For Legal Services Rendered		7.70	1,477.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.20	\$500.00	\$600.00
Anna K. MacFarlane	0.90	275.00	247.50
Gaurav Mankotia	5.20	100.00	520.00
Marshall Swanson	0.40	275.00	110.00

Total Current Work 1,477.50

**Balance Due** \$1,477.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	110.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1367.50	0.00
B100	Administration	1,477.50	0.00

Invoices are payable upon receipt.

# **EXHIBIT D-45**



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September 30, 2023

Invoice No. 243004  
 Account No. 1934.043

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Claims against Steven Fortier - Finder

Fees

				Rate	Hours	
06/06/2023	AKM B190	A101	Attention to service issues; confer with Randall A. Pulman regarding same and requesting continuance of default.	275.00	1.50	412.50
	RAP B190	A105	Office conference with Anna MacFarlane regarding continuance.	500.00	0.20	100.00
06/07/2023	AKM B190	A101	Review of witness and exhibit list; confer with Randall A. Pulman regarding same; filing same.	275.00	0.50	137.50
	RAP B190	A105	Office conference with Anna MacFarlane regarding witness exhibit list.	500.00	0.20	100.00
06/12/2023	AKM B190	A101	Appear for and attend default judgment hearing; inform court of address issues and request reset.	275.00	0.20	55.00
	AKM B190	A101	Final review and upload of final default judgment.	275.00	0.50	137.50
	GM B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
07/17/2023	AKM B190	A101	Attention to service issues.	275.00	0.20	55.00
08/02/2023	AKM B190	A101	Review of witness and exhibit list for default judgment hearing.	275.00	0.50	137.50
08/07/2023	AKM B190	A101	Appear for and attend default judgment hearing.	275.00	0.30	82.50
	GM B190	A101	Attend default judgment hearing through video mode.	100.00	0.30	30.00

Lowe, Pat (dprt)

Statement No. 243004

Account No 1934.043

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Claims against Steven Fortier - Finder

					Rate	Hours	
08/21/2023	AKM	B190	A101	Attention to final default judgment order and amended exhibit.	275.00	0.60	165.00
	GM	B190	A101	Amend final default judgment; email Anna the same.	100.00	0.50	50.00
				For Legal Services Rendered		5.70	1,482.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.40	\$500.00	\$200.00
Anna K. MacFarlane	4.30	275.00	1,182.50
Gaurav Mankotia	1.00	100.00	100.00

Advances

07/17/2023	B110	E106	Online research - TransUnion	25.00
			Total Advances	25.00

Total Current Work 1,507.50

**Balance Due** \$1,507.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	25.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1482.50	0.00
B100	Administration	1,482.50	25.00

Invoices are payable upon receipt.

# **EXHIBIT**

## **D-44**

**No fees or  
expenses in  
this matter**

# **EXHIBIT'D-67**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 243005  
 Account No. 1934.045

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Claims against Scott Nazarino - Finder

Fees

				Rate	Hours	
07/12/2023	AKM	B190	A101	Attention to order to seek default; internal conferences regarding same.	275.00	0.20 55.00
08/11/2023	AKM	B190	A101	Draft and file notice of dismissal.	275.00	0.30 82.50
				For Legal Services Rendered		0.50 137.50

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	0.50	\$275.00	\$137.50

Advances

08/24/2023	B110	E107	Delivery services/messengers - Process service - Hill Country Litigation Services #8902	585.00
			Total Advances	585.00
			Total Current Work	722.50

**Balance Due** \$722.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	585.00
B190	Other Contested Matters (excluding assumption/rejection motions)	137.50	0.00
B100	Administration	137.50	585.00

Lowe, Pat (dprt)

Statement No. 243005

Account No 1934.045

Claims against Scott Nazarino - Finder

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Invoices are payable upon receipt.

# **EXHIBIT'D-68**

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September 30, 2023

Invoice No. 243006  
 Account No. 1934.046

Page: 1

Claims against Senior Insurance Services - Finder

Fees

				Rate	Hours	
07/06/2023	AKM B190	A101	Preparing advisory to court regarding settlement; filing and serving same.	275.00	1.00	275.00
07/10/2023	AKM B190	A101	Appear for docket call; announce settlement.	275.00	0.20	55.00
07/21/2023	AKM B190	A101	Draft stipulation of dismissal of adversary proceeding.	275.00	0.60	165.00
07/24/2023	AKM B190	A101	Continue drafting stipulation; email to defendant regarding signing same.	275.00	0.50	137.50
08/07/2023	AKM B190	A101	Appear for docket call.	275.00	0.10	27.50
	GM B190	A101	Attend hearing through video mode.	100.00	0.10	10.00
08/11/2023	AKM B190	A101	Draft and file voluntary Motion to Dismiss.	275.00	0.60	165.00
			For Legal Services Rendered		3.10	835.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	3.00	\$275.00	\$825.00
Gaurav Mankotia	0.10	100.00	10.00

Total Current Work 835.00



Lowe, Pat (dprt)

Statement No. 243006

Account No 1934.046

Claims against Senior Insurance Services - Finder

Page: 2

**Balance Due**

\$835.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	835.00	0.00
B100	Administration	835.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-69**

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September 30, 2023

Invoice No. 243007  
 Account No. 1934.047

Page: 1

Claims against Safe Money Solutions - Finder

Fees

					Rate	Hours	
06/01/2023	LSH	B190	A103	Continue drafting motion for summary judgment and legal research.	450.00	1.50	675.00
06/02/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	LSH	B190	A103	Continue drafting motion for summary judgment including legal research.	450.00	2.50	1,125.00
	RAP	B190	A105	Office conference with G. Mankotia regarding Motion to Strike.	500.00	0.20	100.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/19/2023	LSH	B190	A103	Draft/revise declaration of G. Murray in support of summary judgment.	450.00	0.90	405.00
06/20/2023	AKM	B190	A101	Office conference with Leslie S. Hyman regarding Motion for Summary Judgment issues.	275.00	0.20	55.00
06/21/2023	LSH	B190	A102	Legal research for motion for summary judgment.	450.00	0.40	180.00
06/22/2023	GM	B190	A101	Prepare Motion to Compel; confer with			

Lowe, Pat (dprt)

Statement No. 243007

Account No 1934.047

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Claims against Safe Money Solutions - Finder

					Rate	Hours	
	RAP	B190	A105	Randall A. Pulman regarding same.	100.00	5.00	500.00
				Office conference with G. Mankotia regarding Motion to Compel.	500.00	0.20	100.00
06/27/2023	GM	B190	A101	Collate documents for discovery production.	100.00	3.00	300.00
06/30/2023	GM	B190	A101	Prepare and finalize motion to compel along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
08/08/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	8.00	800.00
	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.40	180.00
08/10/2023	LSH	B190	A103	Continue drafting discovery responses.	450.00	0.40	180.00
08/11/2023	AKM	B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60	165.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit			

Lowe, Pat (dprt)

Statement No. 243007

Account No 1934.047

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Claims against Safe Money Solutions - Finder

					Rate	Hours	
				list.	275.00	0.20	55.00
08/31/2023	RAP	B190	A104	Review and approval of witness and exhibit list; instructions to staff regarding same.	500.00	0.20	100.00
09/05/2023	RAP	B190	A104	Prepare for hearing on Motion to Strike Jury Waiver; review of exhibits; appear at the hearing on behalf of Lowe, Trustee.	500.00	0.50	250.00
09/13/2023	AKM	B190	A101	Final review, signature, and service of 2nd Supplemental Rule 26(a) Disclosures on opposing counsel.	275.00	0.20	55.00
				For Legal Services Rendered		33.20	6,290.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.30	\$500.00	\$650.00
Anna K. MacFarlane	1.80	275.00	495.00
Gaurav Mankotia	24.00	100.00	2,400.00
Leslie Hyman	6.10	450.00	2,745.00

Total Current Work 6,290.00

**Balance Due** \$6,290.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	6290.00	0.00
B100	Administration	6,290.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT**

## **D-48**

**No fees or  
expenses in  
this matter**

# **EXHIBIT**

## **D-49**

**No fees or  
expenses in  
this matter**

# **EXHIBIT'D-72**



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September 30, 2023

Invoice No. 243008  
 Account No. 1934.050

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Claims against Blanchard &amp; Associates - Finder

Fees

					Rate	Hours	
06/07/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Office conference with G. Mankotia regarding Motion to Strike Jury Demand.	500.00	0.20	100.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/20/2023	GM	B190	A101	Prepare Motion to Compel; confer with Randall A. Pulman regarding same.	100.00	5.00	500.00
	RAP	B190	A105	Office conference with G. Mankotia regarding Motion to Compel.	500.00	0.20	100.00
06/29/2023	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	3.00	300.00
06/30/2023	GM	B190	A101	Prepare and finalize motion to compel along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00

Lowe, Pat (dprt)

Statement No. 243008

Account No 1934.050

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Claims against Blanchard & Associates - Finder

					Rate	Hours	
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
08/02/2023	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
08/03/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	3.00	300.00
	RAP	B190	A105	Office conference with G. Mankotia and L. Hyman regarding Discovery responses.	500.00	0.20	100.00
08/04/2023	GM	B190	A101	Continue Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments.	100.00	3.00	300.00
08/09/2023	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.70	315.00
08/10/2023	LSH	B190	A103	Continue drafting discovery responses.	450.00	0.80	360.00
08/11/2023	AKM	B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60	165.00
	GM	B190	A101	Prepare final written discovery responses and document production; email Anna the same.	100.00	0.50	50.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit list.	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 243008

Account No 1934.050

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Claims against Blanchard & Associates - Finder

					Rate	Hours	
08/31/2023	RAP	B190	A104	Review and approval of witness and exhibit list; instructions to staff regarding same.	500.00	0.20	100.00
09/05/2023	RAP	B190	A104	Prepare for hearing on Motion to Strike Jury Waiver; review of exhibits; appear at the hearing on behalf of Lowe, Trustee.	500.00	0.50	250.00
09/13/2023	AKM	B190	A101	Final review, signature, and service of 2nd Supplemental Rule 26(a) Disclosures on opposing counsel.	275.00	0.20	55.00
				For Legal Services Rendered		27.10	4,115.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.50	\$500.00	\$750.00
Anna K. MacFarlane	1.60	275.00	440.00
Gaurav Mankotia	22.50	100.00	2,250.00
Leslie Hyman	1.50	450.00	675.00

Total Current Work 4,115.00

**Balance Due** \$4,115.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	4115.00	0.00
B100	Administration	4,115.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-73**

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September 30, 2023

Invoice No. 243009  
 Account No. 1934.051

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Claims against Azar Parchami - Finder

Fees

				Rate	Hours	
06/05/2023	AKM B190	A101	Prepare and file advisory to court regarding Parchami settlement.	275.00	0.50	137.50
06/12/2023	GM B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
07/21/2023	AKM B190	A101	Draft stipulation of dismissal of adversary proceeding.	275.00	0.60	165.00
	AKM B190	A101	Emails with Pat Lowe regarding Court's request of pleading resolving adversary.	275.00	0.30	82.50
07/24/2023	AKM B190	A101	Continue drafting stipulation; email to defendant regarding signing same.	275.00	0.50	137.50
08/04/2023	AKM B190	A101	Email and phone call to Azar Parchami following up on stipulation of dismissal.	275.00	0.20	55.00
08/07/2023	AKM B190	A101	Emails to/from Defendant regarding signed stipulation of dismissal.	275.00	0.20	55.00
	AKM B190	A101	Finalizing stipulation of dismissal for filing.	275.00	0.10	27.50
08/08/2023	AKM B190	A101	Attention to Azar Parchami stipulation of dismissal; oversee filing of same.	275.00	0.20	55.00
			For Legal Services Rendered		2.80	735.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	2.60	\$275.00	\$715.00

Lowe, Pat (dprt)

Statement No. 243009

Account No 1934.051

Page: 2

Claims against Azar Parchami - Finder

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Gaurav Mankotia	0.20	100.00	20.00

Total Current Work	735.00
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<b>Balance Due</b>	<u><u>\$735.00</u></u>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	<u>735.00</u>	<u>0.00</u>
B100	Administration	735.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT**

## **D-52**

**No fees or  
expenses in  
this matter**

# **EXHIBIT'D-75**



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September 30, 2023

Invoice No. 243010  
 Account No. 1934.053

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Claims against Domonic Cotton - Finder

Fees

					Rate	Hours	
06/02/2023	GM	B190	A101	Prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Office conference with G. Mankotia regarding Motion to Strike.	500.00	0.20	100.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/19/2023	GM	B190	A101	Prepare Motion to Compel along with a proposed order.	100.00	5.00	500.00
06/21/2023	RAP	B190	A108	Review of Motion to Compel; office conference with G. Mankotia regarding same.	500.00	0.10	50.00
06/27/2023	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	3.00	300.00
06/30/2023	GM	B190	A101	Prepare and finalize motion to compel along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane			

Lowe, Pat (dprt)

Statement No. 243010

Account No 1934.053

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Claims against Domonic Cotton - Finder

					Rate	Hours	
regarding status of adversary and Motion for Summary Judgment.					500.00	0.20	100.00
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
08/02/2023	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
08/08/2023	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.70	315.00
08/09/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00		0.00
	RAP	B190	A104	Review and edit of discovery answers and responses; review of documents produced by Cotton and documents to be produced by Lowe.	500.00	2.50	1,250.00
	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.20	90.00
08/10/2023	LSH	B190	A103	Continue drafting discovery responses.	450.00	0.20	90.00
08/11/2023	AKM	B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60	165.00
	GM	B190	A101	Prepare final written discovery responses and document production; email Anna the same.	100.00	0.50	50.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit list.	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 243010

Account No 1934.053

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Claims against Domonic Cotton - Finder

					Rate	Hours	
08/31/2023	RAP	B190	A104	Review and approval of witness and exhibit list; instructions to staff regarding same.	500.00	0.20	100.00
09/05/2023	RAP	B190	A104	Prepare for hearing on Motion to Strike Jury Waiver; review of exhibits; appear at the hearing on behalf of Lowe, Trustee.	500.00	0.50	250.00
09/13/2023	AKM	B190	A101	Final review, signature, and service of 2nd Supplemental Rule 26(a) Disclosures on opposing counsel.	275.00	0.20	55.00
				For Legal Services Rendered		22.90	4,435.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	3.70	\$500.00	\$1,850.00
Anna K. MacFarlane	1.60	275.00	440.00
Gaurav Mankotia	16.50	100.00	1,650.00
Leslie Hyman	1.10	450.00	495.00

Total Current Work 4,435.00

**Balance Due** \$4,435.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	4435.00	0.00
B100	Administration	4,435.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-76**

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September 30, 2023

Invoice No. 243011  
 Account No. 1934.054

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Claims against Fleming Financial Services Inc - Finder

Fees

					Rate	Hours	
06/07/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Office conference with G. Mankotia regarding motion to strike.	500.00	0.20	100.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/19/2023	AKM	B190	A101	Multiple emails to opposing counsel regarding discovery responses and conferral attempt on extending scheduling order deadlines.	275.00	0.30	82.50
06/20/2023	AKM	B190	A101	Multiple emails with opposing counsel regarding settlement; confer with Randall A. Pulman regarding same.	275.00	0.50	137.50
	RAP	B190	A108	Telephone conference with opposing counsel regarding settlement at 80% on the dollar; confer with A. MacFarlane regarding same.	500.00	0.20	100.00
06/22/2023	AKM	B190	A101	Drafting settlement agreement and agreed judgment as collateral.	275.00	1.50	412.50

Lowe, Pat (dprt)

Statement No. 243011

Account No 1934.054

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Claims against Fleming Financial Services Inc - Fin

				Rate	Hours	
06/23/2023	AKM B190	A101	Continue drafting Fleming settlement agreement and agreed judgment per Randall A. Pulman comments and edits.	275.00	1.00	275.00
06/28/2023	AKM B190	A101	Attention to email regarding opposing counsel redlines to settlement agreement; Randall A. Pulman emails regarding same.	275.00	0.30	82.50
	RAP B190	A104	Review of settlement counter proposal; e-mail to client.	500.00	0.20	100.00
06/30/2023	AKM B190	A101	Finalize settlement agreement and agreed judgment and send to opposing counsel for signatures.	275.00	0.20	55.00
07/10/2023	AKM B190	A101	Emails with opposing counsel regarding signed settlement agreement.	275.00	0.20	55.00
	AKM B190	A101	Email to Pat Lowe regarding signed settlement agreement.	275.00	0.20	55.00
07/11/2023	AKM B190	A101	Emails with Pat Lowe and opposing counsel regarding signed settlement agreement.	275.00	0.30	82.50
07/19/2023	AKM B190	A101	Email opposing counsel regarding receipt of settlement check.	275.00	0.20	55.00
08/07/2023	AKM B190	A101	Appear for docket call.	275.00	0.10	27.50
	GM B190	A101	Attend hearing through video mode.	100.00	0.10	10.00
09/29/2023	AKM B190	A101	Emails with opposing counsel regarding Monday docket call announcement.	275.00	0.20	55.00
			For Legal Services Rendered		11.20	2,235.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	5.00	275.00	1,375.00
Gaurav Mankotia	5.60	100.00	560.00

Total Current Work

2,235.00

Balance Due

\$2,235.00

<u>Task Code Summary</u>		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	2235.00	0.00
B100	Administration	2,235.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-75**



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September 30, 2023

Invoice No. 243012  
 Account No. 1934.055

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Claims against Gregory Talbot - Finder

Fees

				Rate	Hours	
06/12/2023	AKM B190	A101	Appear for and attend default judgment hearing to inform court of ongoing settlement negotiations.	275.00	0.20	55.00
	GM B190	A101	Attend default judgment hearing.	100.00	0.20	20.00
07/05/2023	AKM B190	A101	Email to Talbot regarding settlement.	275.00	0.20	55.00
07/10/2023	AKM B190	A101	Appear for default hearing; secure reset of hearing date.	275.00	0.20	55.00
	AKM B190	A101	Emails with defendant regarding settlement.	275.00	0.20	55.00
07/12/2023	AKM B190	A101	Email to defendant to follow up on settlement and inform him regarding hearing on 8/7/2023.	275.00	0.20	55.00
08/01/2023	AKM B190	A101	Email to/from Defendant regarding default hearing set for 8/7.	275.00	0.20	55.00
08/02/2023	AKM B190	A101	Review of witness and exhibit list for default judgment hearing.	275.00	0.50	137.50
	AKM B190	A101	Emails with Defendant regarding default judgment hearing and answer requirement.	275.00	0.30	82.50
08/07/2023	AKM B190	A101	Emails to/from defendant regarding default hearing and his request for us to file documents on his behalf.	275.00	0.30	82.50
	AKM B190	A101	Confer with Randall A. Pulman regarding			

Lowe, Pat (dprt)

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Claims against Gregory Talbot - Finder

					Rate	Hours	
				Talbot email.	275.00	0.10	27.50
	AKM	B190	A101	Appear for and attend default judgment hearing.	275.00	0.30	82.50
	AKM	B190	A101	Finalize final default judgment per Judge Parker's instructions at hearing; confer with G. Mankotia regarding same.	275.00	0.30	82.50
	GM	B190	A101	Attend default judgment hearing through video mode.	100.00	0.30	30.00
	GM	B190	A101	Prepare final default judgment order; confer with Anna regarding same.	100.00	0.50	50.00
	RAP	B190	A104	Review of default judgment entered against Defendant; office conference with A. MacFarlane regarding same.	500.00	0.20	100.00
08/09/2023	MS	B120	A101	Determine residence of Defendant(s) for purposes of collection against judgment; revise tracking spreadsheet to indicate residence; telephone conference and email exchange with Trustee relating to appointment of counsel for collection.	275.00	0.30	82.50
08/11/2023	GM	B190	A101	Prepare and draft Post Judgment Discovery: confer with Randall A. Pulman regarding same; email MaryAnn the same.	100.00	4.00	400.00
08/29/2023	MS	B120	A101	Attention to appointment of counsel to collect default.	275.00	0.10	27.50
				For Legal Services Rendered		8.60	1,535.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	3.00	275.00	825.00
Gaurav Mankotia	5.00	100.00	500.00
Marshall Swanson	0.40	275.00	110.00

Total Current Work 1,535.00

Lowe, Pat (dprt)

Statement No. 243012

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Claims against Gregory Talbot - Finder

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**Balance Due**

\$1,535.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	110.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1425.00	0.00
B100	Administration	<u>1,535.00</u>	<u>0.00</u>

Invoices are payable upon receipt.

# **EXHIBIT'D-76**

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September 30, 2023

Invoice No. 243013  
 Account No. 1934.056

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Claims against Jack Nace - Finder

Fees

					Rate	Hours	
06/06/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix after Leslie S. Hyman and Randall A. Pulman's comments; confer with Randall A. Pulman regarding same; prepared a complete set including exhibits for Randall A. Pulman's review.	100.00	5.00	500.00
	RAP	B190	A105	Office conference with G. Mankotia regarding Motion to Strike.	500.00	0.20	100.00
06/16/2023	GM	B190	A101	Collate exhibits for Motion to Strike Jury Demand.	100.00	0.50	50.00
06/20/2023	GM	B190	A101	Prepare Motion to Compel; confer with Randall A. Pulman regarding same.	100.00	5.00	500.00
06/21/2023	RAP	B190	A108	Review of Motion to Compel; office conference with G. Mankotia regarding same.	500.00	0.10	50.00
06/28/2023	GM	B190	A101	Collate documents for discovery production; confer with Anna regarding same.	100.00	3.00	300.00
06/30/2023	GM	B190	A101	Prepare and finalize motion to compel along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
07/17/2023	RAP	B190	A108	Office conference with A. MacFarlane			

Lowe, Pat (dprt)

Statement No. 243013

Account No 1934.056

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Claims against Jack Nace - Finder

					Rate	Hours	
				regarding status of adversary and Motion for Summary Judgment.	500.00	0.20	100.00
08/01/2023	AKM	B190	A101	Review and edit of second supplemental Rule 26(a) disclosures.	275.00	0.30	82.50
08/02/2023	GM	B190	A101	Prepare Second Supplemental Rule 26 disclosures; confer with Anna regarding same.	100.00	2.00	200.00
08/09/2023	LSH	B190	A103	Continue drafting discovery responses and gathering responsive documents.	450.00	0.30	135.00
08/10/2023	GM	B190	A101	Draft 'Written Discovery Responses'; included multiple documents in 'Trustee's Proposed Document Production' such as proof of claims and email attachments; multiple emails correspondence with Leslie S. Hyman; office conferences with with Randall A. Pulman and Leslie S. Hyman regarding same.	100.00	8.00	800.00
	LSH	B190	A103	Continue drafting discovery responses.	450.00	0.20	90.00
	RAP	B190	A105	Office conference with G. Mankotia regarding discovery responses.	500.00	0.20	100.00
08/11/2023	AKM	B190	A101	Review and service of written discovery responses and document production.	275.00	0.30	82.50
	AKM	B190	A101	Prepare second joint motion to amend scheduling order & proposed second amended scheduling order; send to opposing counsel for review.	275.00	0.60	165.00
	GM	B190	A101	Prepare final written discovery responses and document production; email Anna the same.	100.00	0.50	50.00
08/30/2023	AKM	B190	A101	Review and edit of witness and exhibit list.	275.00	0.20	55.00
08/31/2023	RAP	B190	A104	Review and approval of witness and exhibit list; instructions to staff regarding same.	500.00	0.20	100.00

Lowe, Pat (dprt)

Statement No. 243013

Account No 1934.056

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Claims against Jack Nace - Finder

					Rate	Hours	
09/05/2023	RAP	B190	A104	Prepare for hearing on Motion to Strike Jury Waiver; review of exhibits; appear at hearing on behalf of Lowe, Trustee.	500.00	0.50	250.00
09/13/2023	AKM	B190	A101	Final review, signature, and service of 2nd Supplemental Rule 26(a) Disclosures on opposing counsel.	275.00	0.20	55.00
				For Legal Services Rendered		28.00	3,815.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.40	\$500.00	\$700.00
Anna K. MacFarlane	1.60	275.00	440.00
Gaurav Mankotia	24.50	100.00	2,450.00
Leslie Hyman	0.50	450.00	225.00

Total Current Work 3,815.00

**Balance Due** \$3,815.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	3815.00	0.00
B100	Administration	3,815.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT**

**D-57**

**No fees or  
expenses in  
this matter**



# **EXHIBIT**

## **D-58**

**No fees or  
expenses in  
this matter**

# **EXHIBIT'D-79**

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September 30, 2023

Invoice No. 243014  
 Account No. 1934.059

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Claims against American Express Company

Fees

				Rate	Hours	
06/05/2023	AKM B190	A101	Multiple emails regarding AmEx settlement.	275.00	0.30	82.50
06/14/2023	AKM B190	A101	Attention to AmEx settlement.	275.00	0.30	82.50
06/15/2023	RAP B190	A108	Manage wire transfer of settlement payment.	500.00	0.50	250.00
07/11/2023	AKM B190	A101	Emails with Frank White regarding settlement.	275.00	0.20	55.00
07/21/2023	AKM B190	A101	Draft stipulation of dismissal of adversary proceeding.	275.00	0.60	165.00
07/24/2023	AKM B190	A101	Continue drafting stipulation; emails to opposing counsel regarding same.	275.00	0.60	165.00
07/26/2023	AKM B190	A101	Emails to/from AMEX counsel regarding stipulation language.	275.00	0.30	82.50
	AKM B190	A101	Finalizing and filing stipulation of dismissal.	275.00	0.30	82.50
			For Legal Services Rendered		3.10	965.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00
Anna K. MacFarlane	2.60	275.00	715.00

Lowe, Pat (dprt)

Statement No. 243014

Account No 1934.059

Claims against American Express Company

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Total Current Work 965.00

**Balance Due** \$965.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	965.00	0.00
B100	Administration	965.00	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-60**

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September 30, 2023

Invoice No. 243015  
 Account No. 1934.060

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TuYo v Transamerica Life Insurance Co 5:22-ev-845 WEST

Fees

					Rate	Hours	
06/05/2023	RAP	B190	A104	Review of conferral letter regarding discovery; respond to same.	500.00	0.50	250.00
06/06/2023	WDM	B190	A104	Review/analyze letter from Transamerica counsel regarding responses to requests for production of documents. Confer with Ben Wulfe regarding document search, response to counsel's letter.	375.00	0.40	150.00
06/09/2023	RAP	B190	A108	Review of documents from second search of data on servers; office conference with clerk regarding same.	500.00	0.50	250.00
06/12/2023	WDM	B190	A104	Review/analyze documents to be produced in response to correspondence from Transamerica counsel.	375.00	1.80	675.00
06/27/2023	WDM	B190	A104	Review documents for production in response to Transamerica subpoena.	375.00	1.00	375.00
07/07/2023	WDM	B190	A107	Correspondence with Jason McKinnie regarding Transamerica document production.	375.00	0.20	75.00
07/11/2023	WDM	B190	A104	Review/analyze documents for supplemental production to Transamerica. Email Correspondence with Jay Patterson regarding same.	375.00	1.20	450.00

Lowe, Pat (dprt)

Statement No. 243015

Account No 1934.060

TuYo v Transamerica Life Insurance Co 5:22-ev-84

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					Rate	Hours	
07/18/2023	RAP	B190	A108	Review of spreadsheet on documents to be produced; office conference with D. Mallender regarding same.	500.00	0.50	250.00
	WDM	B190	A107	Email correspondence with Jay Patterson regarding supplemental production of documents.	375.00	0.30	112.50
	WDM	B190	A104	Review documents to be produced in supplemental production for privileged documents.	375.00	0.70	262.50
	WDM	B190	A105	Confer with Randall A. Pulman regarding supplemental production.	375.00	0.40	150.00
	RAP	B190	A105	Office conference with W. Drew Mallender regarding supplemental production.	500.00	0.40	200.00
07/19/2023	WDM	B190	A104	Final review of documents to be produced in supplemental production.	375.00	0.50	187.50
07/20/2023	RAP	B190	A104	Office conference with D. Mallender regarding production of documents in response to subpoena.	500.00	0.20	100.00
	WDM	B190	A104	Production of documents to Transamerica.	375.00	1.00	375.00
07/24/2023	WDM	B190	A107	Email correspondence with Jason McKinnie regarding supplemental production.	375.00	0.20	75.00
				For Legal Services Rendered		9.80	3,937.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.10	\$500.00	\$1,050.00
W. Drew Mallender	7.70	375.00	2,887.50

Total Current Work 3,937.50

**Balance Due** \$3,937.50

Lowe, Pat (dprt)

Statement No. 243015

Account No 1934.060

TuYo v Transamerica Life Insurance Co 5:22-ev-84

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	3937.50	0.00
B100	Administration	3,937.50	0.00

Invoices are payable upon receipt.



# **EXHIBIT'D-61**

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September 30, 2023

Invoice No. 243016  
 Account No. 1934.061

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Claims against Carlile, Patchen &amp; Murphy, LLP

Fees

				Rate	Hours		
06/27/2023	AKM	B190	A101	Office conference with Randall A. Pulman and Ed Snyder regarding potential claims.	275.00	0.80	220.00
	RAP	B190	A104	Office conference with A. MacFarlane regarding malpractice claim against law firm; office conference with E. Snyder regarding same.	500.00	1.00	500.00
07/05/2023	AKM	B190	A101	Attention to calendar deadlines regarding Zoom depositions of law firm.	275.00	0.20	55.00
	LSH	B190	A105	Conference with R. Pulman regarding upcoming depositions of lawyers.	450.00	0.40	180.00
	LSH	B190	A104	Review emails regarding attorney depositions and scheduling matters.	450.00	0.30	135.00
	RAP	B190	A105	Conference with L. Hyman regarding depositions of lawyers.	500.00	0.40	200.00
07/06/2023	LSH	B190	A108	Review and respond to email from SEC counsel regarding depositions; email with J. Hulings regarding same.	450.00	0.20	90.00
07/07/2023	LSH	B190	A108	Email with SEC counsel regarding attorney depositions.	450.00	0.10	45.00
07/10/2023	LSH	B190	A101	Plan and prepare for depositions of attorneys.	450.00	2.20	990.00
07/11/2023	AKM	B190	A101	Confer with Leslie S. Hyman regarding upcoming depositions of law firm.	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 243016

Account No 1934.061

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Claims against Carlile, Patchen & Murphy, LLP

					Rate	Hours	
	LSH	B190	A101	Plan and prepare for depositions of attorneys.	450.00	3.40	1,530.00
07/12/2023	AKM	B190	A101	Virtually attend deposition of Dennis Concilla.	275.00	6.00	1,650.00
	LSH	B190	A109	Attend via video deposition of Dennis Concilla.	450.00	6.70	3,015.00
07/13/2023	AKM	B190	A101	Remotely appear for and attend deposition of Andrew Federico.	275.00	4.20	1,155.00
	LSH	B190	A109	Attend via video deposition of Andrew Federico.	450.00	4.00	1,800.00
	LSH	B190	A103	Begin drafting memo regarding highlights from attorney depositions.	450.00	0.50	225.00
07/14/2023	LSH	B190	A103	Continue drafting summary of highlights from deposition.	450.00	1.00	450.00
07/17/2023	RAP	B190	A108	Office conference with L. Hyman and A. MacFarlane regarding potential claims and deposition testimony.	500.00	0.50	250.00
	LSH	B190	A103	Continue reviewing notes from depositions and drafting summary of highlights.	450.00	1.30	585.00
	LSH	B190	A105	Conference with R. Pulman and A. MacFarlane regarding potential claims against attorneys.	450.00	0.40	180.00
07/26/2023	AKM	B190	A101	Attention to deposition transcripts of Concilla and Federico.	275.00	0.50	137.50
	AKM	B190	A101	Finalize highlights email and circulate same.	275.00	0.40	110.00
				For Legal Services Rendered		34.70	13,557.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.90	\$500.00	\$950.00
Anna K. MacFarlane	12.30	275.00	3,382.50
Leslie Hyman	20.50	450.00	9,225.00

Lowe, Pat (dprt)

Statement No. 243016

Account No 1934.061

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Claims against Carlile, Patchen & Murphy, LLP

Total Current Work 13,557.50

**Balance Due** \$13,557.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	13557.50	0.00
B100	Administration	13,557.50	0.00

Invoices are payable upon receipt.

# **EXHIBIT'D-62**

**PULMAN, CAPPUCIO & PULLEN, LLP**

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September 30, 2023

Invoice No. 243017  
 Account No. 1934.062

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Claims against JP Morgan Chase

Fees

				Rate	Hours	
06/05/2023	AKM B190	A101	Confer with Randall A. Pulman regarding motion to dismiss.	275.00	0.20	55.00
	AKM B190	A101	Redacting WF bank records to send to JPMC counsel.	275.00	1.00	275.00
	AKM B190	A101	Email to JPMC counsel with documents regarding resolution.	275.00	0.50	137.50
	RAP B190	A105	Confer with A. MacFarlane regarding Motion to Dismiss.	500.00	0.20	100.00
06/07/2023	AKM B190	A101	Phone call with Randall A. Pulman and opposing counsel regarding extension of response deadline and resolution.	275.00	0.30	82.50
	AKM B190	A101	Preparing draft stipulation; confer with Randall A. Pulman regarding same; email same to opposing counsel for approval.	275.00	0.30	82.50
	RAP B190	A104	Telephone conference with opposing counsel regarding status of an extension on responses to 12(b)(6).	500.00	0.50	250.00
06/08/2023	AKM B190	A101	Emails with opposing counsel regarding draft stipulation.	275.00	0.20	55.00
06/09/2023	AKM B190	A101	Emails with opposing counsel regarding stipulation regarding extending time to respond to motion to dismiss.	275.00	0.20	55.00
	AKM B190	A101	Finalizing and filing stipulation regarding extending time to respond to motion to dismiss.	275.00	0.50	137.50

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Claims against JP Morgan Chase

					Rate	Hours	
06/12/2023	AKM B190	A101	Email to opposing counsel with proofs of claim.		275.00	0.50	137.50
06/23/2023	AKM B190	A101	Emails regarding second extension on response deadline to motion to dismiss.		275.00	0.30	82.50
	AKM B190	A101	Emails with opposing counsel regarding second extension.		275.00	0.30	82.50
07/06/2023	AKM B190	A101	Emails to/from opposing counsel regarding settlement/third stip.		275.00	0.20	55.00
07/07/2023	AKM B190	A101	Prepare third stipulation of extension; confer with opposing counsel regarding same.		275.00	0.80	220.00
07/12/2023	AKM B190	A101	Emails with opposing counsel and Randall A. Pulman regarding plan moving forward.		275.00	0.30	82.50
07/18/2023	AKM B190	A101	Amending JPMC complaint.		275.00	2.00	550.00
08/14/2023	AKM B190	A101	Confer with G. Mankotia regarding initial disclosures.		275.00	0.10	27.50
	GM B190	A101	Prepare 26(a) disclosures; confer with Anna regarding same; email Anna the same.		100.00	4.00	400.00
08/16/2023	AKM B190	A101	Review of Rule 26 disclosures.		275.00	0.30	82.50
08/17/2023	AKM B190	A101	Continue drafting initial disclosures for Randall A. Pulman review.		275.00	0.50	137.50
	RAP B190	A104	Review and approval of Rule 26(a) disclosures.		500.00	0.20	100.00
08/18/2023	AKM B190	A101	Finalize and serve Rule 26 initial disclosures with documents.		275.00	0.70	192.50
	AKM B190	A101	Review of initial disclosures from defendant.		275.00	0.20	55.00
	GM B190	A101	Prepare RFP; confer with Randall A. Pulman and Anna regarding same.		100.00	4.00	400.00
09/11/2023	AKM B190	A101	Initial review of discovery requests;				

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Claims against JP Morgan Chase

	Rate	Hours	
attention to emails regarding same.	275.00	0.30	82.50
For Legal Services Rendered		18.60	3,917.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.90	\$500.00	\$450.00
Anna K. MacFarlane	9.70	275.00	2,667.50
Gaurav Mankotia	8.00	100.00	800.00

Total Current Work	3,917.50
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<b>Balance Due</b>	<b><u>\$3,917.50</u></b>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	3917.50	0.00
B100	Administration	3,917.50	0.00

Invoices are payable upon receipt.